FACILITIES CLOSURE REPORT

TRENT TUBE DIVISION FULLERTON PLANT COLT INDUSTRIES, INC.

2100 E. Orangethorpe Avenue Fullerton, California

FOR SUBMITTAL TO:

CALIFORNIA DEPARTMENT OF HEALTH SERVICES
HAZARDOUS WASTE MANAGEMENT BRANCH
107 South Broadway, Room 7128
Los Angeles, California

March 1985



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I. Background Information

On April 6, 1981, the Fullerton operation of Trent Tube Division of Colt Industries was issued Interim Status Document CAD 008325110 by the State of California, Department of Health Services (DOHS), which authorized the treatment and storage of hazardous wastes on the Plant premises subject to a number of conditions as described in an attachment. A copy of that document and the attachment pages referring to closure are enclosed as Appendix A.

One of the conditions in the Interim Status Document called for the preparation and submittal of an Operations Plan for hazardous waste treatment and storage at the Facility. The Operations Plan also required the inclusion of a Contingency Plan for the Facility and a formal written Closure Plan which is subject to approval of the Regional Water Quality Control Board.

On August 26, 1983, Trent Tube submitted the required formal Operations Plan for Hazardous Waste to the DOHS. The Operations Plan includes a written Closure Plan dated February 22, 1983, as an Appendix to that Report. A copy of that original Closure Plan is included as Appendix B of this Report.

The cover letter of that submittal, which is also included in Appendix B, specifically notified that Agency that the Fullerton Facility would close on or before December 31, 1983.

II. Revision of Closure Plan Prior to Actual Closure

From March 28-30, 1984, Mr. Richard W. Klippel, P.E., of Calocerinos & Spina, Consulting Engineers (C&S), and Robert Phillips of Trent Tube inspected the Plant and assisted Mr. Harry Murphy, Plant Manager, in updating and revising the Closure Plan and cost estimate. On March 29, 1984, Mr. Klippel and Mr. Phillips met with Mr. Kurt Burchtold of the Santa Ana Regional Water Quality Control Board to discuss the pending Plant closure and submittal of the notice and revised Closure Plan. Mr. Burchtold advised Trent Tube to submit the Plan to both the Water Quality Control Board and the DOHS.

On April 1, 1984, in accordance with provisions of Attachment A, Section V, of the Interim Status Document, the Revised Closure Plan and cost estimate were submitted by certified letter to the Santa Ana Regional Water Quality Control Board. As per Mr. Burchtold's recommendation, a copy of the Plan was sent to the DOHS. That Closure Plan identified the actual closure date of May 11, 1984.

On May 4, 1984, Trent Tube received a copy of a memo from the Regional Water Quality Control Board to the DOHS referring closure approval for the Facility to the DOHS. In that memo, the Regional Water Quality Board stated that no problems were noted during their inspection of the Facility or in their review of the Closure Plan, with one exception. That exception involved small areas of soil contaminated with waste oil which were noted on the south side of the Plant during their inspection. Their memo notes that the Plant Manager, Mr. Harry Murphy, stated that, during closure, the soil in those areas would be removed to a depth of 3 feet.

A copy of the Revised Closure Plan and the Regional Water Quality Control Board's letter are contained in Appendix C.

III. Actual Closure Activities

During April 1984 Trent Tube began to deactivate portions of their manufacturing operation and on May 11, 1984, the Firm ceased all manufacturing at the Facility. During this period, and throughout the remainder of May, the Company fully implemented all of the items referenced in the Closure Plan including:

- Removal of all drums of waste solvents plus detergent cleaning wastes.
- Removal of all remaining virgin solvents.
- Removal of waste oils for recycling.

- 4. Washing and rinsing of the degreaser tank in the Building and disposal of the wash waters.
- Neutralization and disposal of the pickling acids contained in tanks in the Building.
- 6. Dismantling and removal of the pickling tanks and exhaust ducts used to vent the tank.
- 7. Removal of ammonia and associated storage tanks by suppliers.
- 8. Removal and disposal of contaminated soil behind the Building as requested by the Regional Water Quality Control Board.

Table 1, attached, shows the various items removed for disposal and the transporter, disposal site and manifest number for each. Copies of all manifests are included in Appendix D, along with photos of the areas excavated.

IV. Closure Certification

On August 16, 1984, Mr. Richard Klippel under the direction of Mr. Frank Spina, California P.E. #39026, Partner, Calocerinos & Spina, Consulting Engineers, inspected the vacant and closed Facility and reviewed photographs, manifests and billing records pertaining to the closure activities. On August 29, 1984, Mr. Frank Spina, on the basis of Mr. Klippel's inspection, certified by letter that the Facility was closed in accordance with the Closure Plan dated April 1, 1984. A copy of that Closure Certification is enclosed as Appendix E. Since the August 16th letter was inadvertently sealed with Mr. Spina's New York seal, an additional certification with the California seal was provided on December 13, 1984.

V. Additional Cleanup Requirements

On December 12, 1984, Mr. Robert Phillips received a letter dated December 3, 1984, from the Facility Permitting Unit of the DOHS advising Trent Tube that the Closure Plan was inadequate and the subsequent Closure Certification

TABLE 1

DISPOSAL DESTINATION FOR HAZARDOUS ITEMS

FROM

TRENT TUBE CLOSURE, FULLERTON, CALIFORNIA

-					
Date of Disposal	<u>Item</u>	Quantity	Transporter	Disposal Site	Manifest No.
3/13/84	Oily wash water	400 gals.	Kens 011 Co.	BKK Corp. West Covina	83170052
5/2/84	Oily wash water	300 gals.	Lakewood Oil Serv.	BKK Corp. West Covina	83318904
5/23/84	Contaminated soil	20 c.y.	J-Cal Trans.	BKK Corp. West Covina	83170053
5/23/84	Contaminated soil	20 c.y.	J-Cal Trans.	BKK Corp. West Covina	83170054
5/23/84	Contaminated soil	15 c.y.	Magee Bros. Trkg.	BKK Corp. West Covina	83432430
5/23/84	1,1,1-Trichlor and oil	3,000 gals.	Oil Process	Baron Blakeslee Corp.	83432428
5/25/84 5/26/84	Waste oil to recycling Neutralized pickling acid	160 gals. 2,100 gals.	Rutherfield Pacific Liquid Waste Management		83326982 83170055
5/29/84	Pickling tank and liner	10,000 lbs.	Industrial Waste Utilization	BKK Corp. West Covina	83432433
5/29/84	Tank and residue	2,400 lbs.	Industrial Waste Utilization	BKK Corp. West Covina	83432434
5/29/84	Tank, liner and residue	10,000 lbs.	Industrial Waste Utilization	BKK Corp. West Covina	83432435
5/29/84	Oily wash water	500 gals.	United Pumping Service	BKK Corp. West Covina	83170056
5/30/84	Waste acids and adsorbant	800 lbs.	Industrial Waste Utilization	BKK Corp. West Covina	83432440
5/30/84	1,1,1-Trichloroethane, oil	145 gals.	Industrial Waste Utilization	Baron Blakeslee Corp.	83432441
5/31/84	Misc. paints, solvents	3,600 lbs.	Industrial Waste Utilization	BKK Corp. West Covina	83432442
5/31/84	and adsorbants Empty drums and residues	600 lbs.	Industrial Waste Utilization	BKK Corp. West Covina	83432439

inappropriate. The letter directed that a written Site Assessment Plan, prepared by an independent engineer registered in the State of California, be submitted to their office by December 15, 1984. The letter further stated that the Plan must provide for sampling and chemical assessment of all areas which were excavated at the Direction of the Regional Water Quality Control Board and all other areas that could be contaminated with hazardous wastes. The Plan must identify all principals, including the analytical laboratory, and all other contractors used. The Plan should also include drawings, sketches and/or photographs necessary to fully describe areas of concern and should propose remedial actions that would be taken if found to be necessary.

On December 14, 1984, officials of Trent Tube, Calocerinos & Spina, and Wayne Smith, Esq., of Gibson, Dunn and Crutcher, Attorneys, met with Mr. Roy Thielking of the Facility Permitting Unit staff and discussed the matter in some detail. At that meeting, it was agreed that Trent Tube would proceed with the submittal of the Site Assessment Plan and the subsequent execution of the activities upon Plan approval. Since Trent Tube had a purchase offer for the property and considered time to be of the essence, they requested that Mr. Thielking publish the required public notice at the earliest opportunity. Furthermore, it was agreed that Trent Tube would attempt to complete the site evaluation procedure to the Department's satisfaction prior to the expiration of the required 45-day public comment period. Thus, by approximately February 1, 1985, closure certification could be accomplished thereby allowing closing on the sale of the property.

VI. Site Assessment

A Site Assessment Plan was prepared and transmitted to Mr. Thielking on December 18, 1984, under the signature and seal of Frank J. Spina, California P.E. #39026. The Assessment Plan, which is included as Appendix F, outlined a

plan for obtaining borings and analyses of soil samples during the period from December 26-28, 1984, and submittal of an Assessment Report by January 15, 1985, outlining any remediation deemed necessary.

The site assessment work began on December 26, 1984, under the overall direction of Mr. Andrew Diefendorf, CPG, of Calocerinos & Spina.

Mr. David Bramwell, CEG, of IT Corporation, Irvine, California, supervised the drilling activities of the subcontractor, Pioneer Drilling Company, and obtained the required boring samples for analysis. The samples were packed in ice and shipped by air express to California Analytical Services in Sacramento, California, where they were analyzed for suspected organics utilizing USEPA Methods 601 and 602. On-site readings of the soils at various locations were taken by Mr. Bramwell utilizing an organic vapor meter. The analytical results from the boring samples along with the organic vapor meter readings confirmed the presence of additional organic contamination at low levels near the rear of the Trent Tube Building and organic contamination at a much higher level near the back fence of the Trent Tube property adjacent to the paved Solvent Storage Area belonging to Vista Paint Company. Thus, further remediation of the site was judged to be necessary.

VII. Site Remediation Activities

On January 18, 1985, a Site Remediation Plan was submitted to Mr. Thiekling of DOHS under the signature and seal of Mr. Frank J. Spina. The Plan, which is contained in Appendix G, contains all of the boring logs and analytical results along with drawings detailing the limits of excavation of contaminated soil in several areas of the site.

In subsequent telephone conversations, Mr. Thielking verbally agreed with the recommended remediation steps but advised that he would have to have a letter of approval from the South Coast Air Quality Management District (SCAQMD) before he could give his formal approval.

On January 28, 1985, C&S provided the SCAQMD with a copy of the Site Remediation Plan and inquired as to the need for an Air Permit. A letter was also sent to Mr. Thielking advising him of our contact with SCAQMD and requesting written approval of the Remediation Plan from the DOHS.

On February 3, 1985, Trent Tube submitted an Application for an Excavation Permit along with an Excavation Plan narrative to SCAQMD and DOHS.

On February 7, 1985, Mr. Diefendorf of Calocerinos & Spina, Mr. Phillips of Trent Tube and Mr. Charles Templar of Industrial Waste Utilization met with Mr. Lettice of the SCAQMD in El Monte and were given an Excavation Permit letter with a list of permit conditions. Copies of the referenced correspondence and the Permit are enclosed as Appendix H.

On February 8, 1985, Mr. Diefendorf and Mr. Phillips met with Mr. Thielking to advise him of the issuance of the Air Permit and to request written approval to proceed with the remedial excavation work. While a letter was not given them, they left with a feeling that they had verbal approval of the Remediation Plan and could proceed with the excavation described in that Plan.

Excavation activities at the site therefore commenced on February 11, 1985, under the supervision of Mr. Diefendorf, C&S. A total of four truckloads (57 cubic yards) of contaminated soil were excavated and transported to the Casmalia Resources Landfill, Casmalia, California. Photos showing the excavation area and manifests for the four loads are contained in Appendix I.

Late Monday morning Mr. Diefendorf talked by phone with Mr. Thielking who informed him that a letter was being prepared requiring excavation of a much larger area of soil for shipment to disposal and also requiring submittal of a plan for investigating contamination between the Trent Tube fence and the large drainage channel behind the site.

With the uncertainty regarding the extent of work required, Trent Tube decided to halt any further excavation and seek clarification from the DOHS. The letter referenced by Mr. Thielking was received by Trent Tube on February 20, 1985. A copy of that letter is enclosed in Appendix J.

On February 21, 1985, representatives of Trent Tube, Colt Industries, Calocerinos & Spina, and Gibson, Dunn & Crutcher met with Mr. Thielking and Mr. Sneh of the DOHS to clarify the extent of the required excavation. Mr. Sneh stated that a closure certification would be granted to Trent Tube if they completed the work described in the Remediation Plan plus the additional on-site excavation as outlined in the February 20, 1985, letter. It was determined that the Closure Notification had been published in the newspaper and that no comments had been received during the 45-day notice period. Thus, the notification requirement had been fulfilled.

With that clarification Trent Tube resumed excavation at the site on February 25, 1985. Sixteen additional loads of contaminated soil were transported to the Casmalia Resources Landfill on February 25, 26 and 27, 1985. Manifests for the 16 loads are contained in Appendix K. The boundaries of the expanded excavation area are shown in Figure 9 in Appendix K.

Soils from Area B at the site, outside of the extended Area A, were removed to the designated area east of the building and spread in a thin layer for aeration. During the period of aeration, the warm (75°F) dry weather resulted in excellent drying of the material. Furthermore, the material was turned over during aeration to further enhance volatilization of the contaminants.

On February 28, 1985, 16 truckloads of clean fill material were backfilled into the excavated hole and compacted. On March 1, 1985, the aerated soil was removed from the aeration area and placed back in the excavation. The aerated soil comprises the top 2 feet of the entire area as shown in Figure 10 in

Appendix K. The Appendix also contains photographs showing the area after excavation, and after backfill and final grading.

Mr. Richard J. Kulibert, Hydrogeologist with Calocerinos & Spina, inspected the final excavation and backfilling operations from January 25 through March 1, 1985. Excavation work was performed by Industrial Waste Utilization and transportation of the waste was provided by J-Cal Transportation.

At this point in time, the site has been completely remediated in accordance with the Amended Plan approved by the California Department of Health Services, and a Certification to that effect is included in the transmittal letter for this Report.

Respectfully submitted,

2/11/81

CALOCERINOS & SPINA

Frank J. Spina, P.E.

Partner

FJS:RWK:mts

Enclosures

No. 39026

PROFESSIONAL CONTROL CONTRO

8

APPENDIX A

INTERIM STATUS DOCUMENT
AND
CLOSURE PROVISIONS

DEPARTMENT OF HEALTH SERVICES



Facility: Trent Tube Division

Fullerton Operation
2100 East Orangethorpe
Avenue
Orange County
Fullerton, CA 92634

Operator: Trent Tube Division of
Crucible, Inc.
P.O. Box 3068
Fullerton, CA 92634

DINTERIM STATUS DOCUMENT

Number: CAD 008325110

Effective Date: April 6, 1981

Crucible, Inc.
P.O. Box 3068
Fullerton, CA 92634

Pursuant to Section 25200.5 of the California Health and Safety Code, this Interim Status Document is hereby granted to Trent Tube Division of Crucible, Inc., subject to the conditions set forth in Attachment A which by this reference is incorporated herein.

Harvey F. Collins, Ph.D., Chief Environmental Health Branch

CLOSURE

V.

1. Closure.

The owner or operator shall close his facility in a manner that:
(a) minimizes the need for further maintenance, and (b) controls, minimizes or eliminates, to the extent necessary to protect human health and the environment, post-closure escape of hazardous waste, hazardous waste constituents, leachate, contaminated rainfall, or waste decomposition products to the ground water, or surface waters, or to the atmosphere.

- Closure plan and amendment of plan.
 - (a) The owner or operator shall have a written closure plan. This plan shall be subject to approval by the California Regional Water Quality Control Board and shall be kept at the facility. This plan shall identify the steps necessary to close the facility completely at any point during its intended life and at the end of its intended life. The closure plan shall include, at least:
 - (1) A description of how and when the facility will be partially closed, if applicable, and ultimately closed. The description shall identify the maximum extent of the operation which will be unclosed during the life of the facility, and how Item I and other applicable conditions of this document will be met;
 - (2) An estimate of the maximum inventory of wastes in storage or in treatment at any given time during the life of the facility;
 - (3) A description of the steps needed to decontaminate facility equipment during closure; and
 - (4) A schedule for final closure which shall include, as a minimum, the anticipated date when wastes will no longer be received, the date when completion of final closure is anticipated, and intervening milestone dates which will allow tracking of the progress of closure. (For example, the expected date for completing treatment or disposal of waste inventory shall be included, as must the planned date for removing any residual wastes from storage facilities and treatment processes.)

- (b) The owner or operator may amend his closure plan at any time during the active life of the facility. (The active life of the facility is that period during which wastes are periodically received.) The owner or operator shall amend his plan any time changes in operating plans or facility design affect the closure plan.
- (c) The owner or operator shall submit his closure plan to the California Regional Water Quality Control Board at least 180 days before the date he expects to begin closure. The California Regional Water Quality Control Board will modify, approve, or disapprove the plan within 90 days of receipt and after providing the owner or operator and the affected public (through a newspaper notice) the opportunity to submit written comments.
- 3. Time allowed for closure.
 - (a) Within 90 days after receiving the final volume of hazardous wastes, the owner or operator shall treat all hazardous wastes in storage or in treatment, or remove them from the site, or dispose of them on-site, in accordance with the approved closure plan.
 - (b) The owner or operator shall complete closure activities in accordance with the approved closure plan and within six months after receiving the final volume of wastes. The California Regional Water Quality Control Board may approve a longer closure period under Item 2 (c) if the owner or operator can demonstrate that: (l) the required or planned closure activities will, of necessity, take him longer than six months to complete, and (2) that he has taken all steps to eliminate any significant threat to human health and the environment from the unclosed but inactive facility.
- 4. Disposal or decontamination of equipment.

When closure is completed, all facility equipment and structures shall have been properly disposed of, or decontaminated by removing all hazardous waste and residues.

5. Certification of closure.

When closure is completed, the owner or operator shall submit to the California Regional Water Quality Control Board certification both by the owner or operator and by an independent registered professional engineer that the facility has been closed in accordance with the specifications in the approved closure plan.

VI. FINANCIAL RESPONSIBILITY

- Cost estimate for facility closure.
 - (a) The owner or operator shall have a written estimate of the cost of closing the facility in accordance with the applicable closure requirements of this document. The owner or operator shall keep this estimate, and all subsequent estimates, at the facility. The estimate shall equal the cost of closure at the point in the facility's operating life when the extent and manner of its operation would make closure the most expensive, as indicated by its closure plan.
 - (b) The owner or operator shall prepare a new closure cost estimate whenever a change in the closure plan affects the cost of closure.
 - (c) On each anniversary of the effective date of this document, the owner or operator shall adjust the latest closure cost estimate using an inflation factor derived from the annual implicit Price Deflator for Gross National Product as published by the U.S. Department of Commerce in its Survey of Current Business. The inflation factor shall be calculated by dividing the latest published annual Deflator by the Deflator for the previous year. The result is the inflation factor. The adjusted closure cost estimate shall equal the latest closure cost estimate (see Item 1(b)) times the inflation factor.

APPENDIX B

CLOSURE PLAN AND NOTIFICATION SUBMITTED ON AUGUST 26, 1983

Colt Industries



ALN Copy Trent Tube Division
Crucible inc
P. O. Box 3068
2100 East Orangethorpe
Fullerton, California 92634
714/526-5522

CAD 008325110

August 26, 1983

California State Dept. of Health Services Hazardous Waste Management Branch 107 South Broadway, Room 7128 Los Angeles, California

Gentlemen:

Enclosed is our operation plan for hazardous waste, treatment and storage at the Fullerton operation.

This letter will also serve as notice that this plant will close on or before December 31, 1983. A closure plan is incorporated as part of the operation.

Sincerely,

Harry L. Murphy

Manager of Quality Assurance

Harry & Murphy

cc: C. Abend

D. Gehr

F. Hunter

OPERATION PLAN

FOR

HAZARDOUS WASTE

TRENT TUBE DIVISION COLT INDUSTRIES FULLERTON OPERATION

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CLOSURE PLAN AND COST ESTIMATES FOR HAZARDOUS WASTE FACILITIES

FACILITY: Trent Tube Division, Fullerton Operation

2100 East Orangethorpe Avenue

Orange County

Fullerton, California 92634

OPERATOR: Trent Tube Division of Crucible, Inc.

P.O. Box 3068

Fullerton, California

FACILITY ID NO.: CAD 008325110

FACILITY PHONE NO.: (714) 526-5522

I. GENERAL

- A. This plan is prepared in compliance with the California Department of Health Services, Interim Status Document for the Fullerton facility, Section V, dated April 6, 1981.
- B. This plan is to be submitted for approval to the California Regional Water Quality Board at least 180 days prior to the facility closure for a period exceeding 90 days.

II. WASTE INVENTORY

- A. Pickle Liquor EPA Number K062
 - (1) Contained in two process tanks of 2000 gallons each. Haximum volume at closure, 4000 gallons total.
 - (2) Waste is neutralized prior to disposal in a class I landfill.
- B. 1.1.1 Trichloroethane Waste EPA Number F001
 - (1) Waste is contained in 55 gallon drums. Maximum capacity is 15 drums.
 - (2) Process fluid is contained in a process tank of 2400 gallons maximum capacity.
- C. Waste Mineral Spirits & Kerosene
 - (1) Contained in 55 gallon drums.
 - (2) Maximum capacity of 3 drums at closure.

TRENT TUBE DIVISION - COLT INDUSTRIES FULLERTON, CALIFORNIA

- D. Waste Oil EPA Number NA
 - (1) Contained in 10-20 gallon resevoirs at each of six draw benches.
 - (2) Maximum storage capacity is 200 gallons bulk waste plus the resevoir at each draw bench.
- E. Caustic Cleaning Wastes EPA Number NA
 - Contained in a steel storage tank of 200 gallons maximum capacity.
 - (2) Neutralization is required before disposal in a class 1 landfill.

_ III. FACILITY DECONTAMINATION STEPS

- A. Acids & Caustics
 - Neutralize these solutions (ph 6/8).
 - (2) Have solutions pumped to a bulk tank truck.
 - (3) Water rinse all tanks.
 - (4) Transfer rinse solution to the bulk tank truck.
 - (5) Arrange for disposal in class 1 landfill.
- B. Waste Oil
 - (1) Transfer from bench resevoirs to storage tank then to bulk truck with a vacuum system.
 - (2) Water rinse and pump solution to bulk tank truck.
 - (3) Arrange for disposal in class 1 landfill.
- C. 1.1.1 Trichloroethane, Mineral Spirits & Kerosene
 - (1) Arrange for a reclaimer to pick up and remove material from premises.

IV. CLOSURE SCHEDULE

- A. Wastes will no longer be generated after 15 days of closure.
- B. Wastes will be treated and/or removed from the facility within 30 days of closure.

V. COST ESTIMATES FOR FACILITY CLOSURE

A. Pickle Liquor

(1)	Neutralize and clean tanks, labor 8 hours @ \$18/hr.	\$144.00
(2)	Vacuum truck service	850.00
(3)	Dump fee - 18 tons @ \$4/ton	72.00

B. Caustic & Oil Wastes

(1)	Transfer oil from draw benches, labor 8 hours @ \$18/hr.	\$144.00
	Neutralize caustic tank, labor 1 hour @ \$18/hr.	18.00
	Vacuum truck service	85.00
	Dump fee 1.6 tons @ \$4/ton	7.00

C. 1,1,1 Trichloroethane, Mineral Spirits & Kerosene

(1)	Labor eight hours	@ \$18/hr.	•	144.00

Subtotal \$1464.00

D. Administration & Contingencies

(1)	Administration (including supervision and paperwork).	316.00
(2)	Contingencies (15% of \$1464).	220.00

Total cost of closure \$2000.00

VI. CERTIFICATION OF CLOSURE

A. Trent Tube and an independent registered professional engineer shall submit to the California Regional Water Quality Board certification that the facility has been closed and wastes removed in accordance with specifications of the CRWQB approved plan.

Prepared by:

Harry & Murphy

Fret 22, 1983

cc: H. Murphy

C. Abend

R. Holmes

J. Pawlowski

M. Short

S. Cornell

D. Gehr

R. Haak

APPENDIX C

REVISED CLOSURE PLAN AND COMMENT LETTER
FROM REGIONAL BOARD

Colt Industries



Trent Tube Division
Crucible Inc
P. O. Box 3068
2100 East Orangethorpe
Fullerton, California 92634
714/526-5522

April 1, 1984

Regional Water Quality Control Board Santa Ana Region 6809 Indiana Avenue, Suite 200 Riverside, California 92506

Attention: James Anderson, Executive Officer

Reference: Facility Closure - CAD 008325110

Gentlemen:

In accordance with provisions of our interim status document number CAD 008325110 effective April 6, 1981, the Trent Tube Division hereby formally submits notification of its intent to close its manufacturing facility at 2100 East Orangethorpe Avenue, Fullerton, California, 92634, and hereby transmits for the record, a copy of our latest revised closure plan for the subject facility as required by Section V paragraph 2 (c) of that document.

In accordance with Section 1 (d) of the referenced interim status document, the owner notified the California State Department of Health Services of the proposed closure of the facility by certified letter on August 26, 1983, a copy of which is attached for reference.

The company plans to discontinue manufacturing operations at the subject facility on Friday, May 11, 1984, and to proceed at that time with the schedule of activities contained in the attached closure plan.

In accordance with discussions on March 29, 1984, between myself and consultant Mr. Klippel of Calocerinos & Spina, and Mr. Berchtold of your staff, we look forward to the expeditious review offered by your agency and trust that you will promptly advise us of any deficiencies noted in the closure document. Enclosed per Mr. Berchtolds' request is a copy of the Facilities Operating Plan as submitted to the Department of Health Services on August 26, 1984.

Thank you for your assistance in this matter and please do not hesitate to call if you have any questions or need additional information.

Very truly yours,
Trent Tube Division

Crucible Materials Corp.

cc: Dept. of Health Services Hazardous Waste Management Board CLOSURE PLAN AND COST ESTIMATES FOR HAZARDOUS WASTE FACILITIES

Trent Tube Division, Fullerton Operation FACILITY:

2100 East Orangethorpe Avenue

Orange County

Fullerton, California

OPERATOR: Trent Tube Division

Crucible Materials Corporation

P.O. Box 3068

Fullerton, California 92634

CAD 008325110 FACILITY ID NO .:

FACILITY PHONE NO.: (714) 526-5522

I. GENERAL

- This plan is prepared in compliance with the California Α. Department of Health Services, Interim Status Document for the Fullerton facility, Section V, dated April 6, 1981.
- This plan is to be submitted for approval to the California В. Regional Water Quality Board (CRWQB) prior to closure.

The local board is located at:

6809 Indiana Street Suite 200

Riverside, California

Mr. James Anderson Attention: Executive Officer

714/684-9330

WASTE INVENTORY II.

- Pickle Liquor EPA Number KO62
 - Contained in two process tanks of 2000 gallons each. (1) Maximum volume at closure, 4000 gallons total.
 - (2) Waste is neutralized prior to disposal.

- B. 1,1,1 Trichloroethane Waste EPA Number F001
 - (1) Waste is contained in 55 gallon drums. Maximum storage capacity is 15 drums.
 - (2) Solvent used during manufacturing is contained in a degreaser unit having a maximum capacity of 2400 gallons.
- C. Waste Mineral Spirits & Kerosene
 - (1) Contained in 55 gallon drums.
 - (2) Storage capacity at closure is 8 drums.
- D. Waste Oil EPA Number NA
 - (1) Contained in 10/20 gallon reservoirs at each of six draw benches.
 - (2) Maximum storage capacity is 200 gallons bulk waste plus the reservoir at each draw bench.
- E. Dilute Detergent Cleaning Wastes EPA Number NA
 - (1) Contained in a steel storage tank 200 gallons maximum capacity.

III. FACILITY DECONTAMINATION STEPS

- A. Pickle Liquor Facilities
 - Neutralize pickling acids with ammonia as per operating plan.
 - (2) Pump neutralized solutions to bulk tank truck.
 - (3) Manifest solutions for treatment and disposal.
 - (4) Dismantle and cut up nitric-HF pickle tank and exhaust intakes inside building.
 - (5) Manifest contaminated equipment for disposal.
 - (6) Arrange with supplier to remove ammonia storage tanks and vent ammonia feed system.
- B. 1,1,1 Trichloroethane Facilities
 - (1) Arrange with reclaimer to pump out degreasing tank, recovery still equipment and 55 gallon drums of still bottoms.
 - (2) Arrange with reclaimer to haul off remaining quantities of virgin solvent in outside storage tanks.

- (3) Rinse degreasing tank and recovery still system with detergent and water pump detergent solution to bulk tank truck for disposal.
- (4) Manifest solvent and cleaning solution for disposal.
- (5) Arrange with vendor for removal of vertical storage tank.
- (6) Clean and ventilate remaining horizontal storage tank.
- C. Mineral Spirit and Kerosene Facilities
 - (1) Arrange with reclaimer to pump out 55 gallon drums.
 - (2) Clean impound areas with detergent solution.
 - (3) Transfer cleaning solution to the 200 gallon storage tank.
 - (4) Manifest mineral spirits and kerosene for disposal by recycling.
- D. Waste Oil Facilities
 - (1) Transfer oil from draw bench reservoirs to 200 gallon storage tank.
 - (2) Rinse draw bench reservoirs and pump system with detergent solution.
 - (3) Transfer detergent solution to storage tank.
 - (4) Arrange for disposal of waste oil from 200 gallon storage tank.
 - (5) Rinse out 200 gallon storage tank with detergent.
 - (6) Rinse out oily waste impound area with detergent.
- E. Detergent Cleaner Solution Disposal
 - (1) Pump out 200 gallon storage tanks (2) and impound area into tank truck.
 - (2) Manifest cleaning solutions for proper disposal.
- F. Empty Drum Disposal
 - (1) Arrange for drum reprocessor to pick up reusable drums.
 - (2) Crush unusable drums and manifest for disposal.

IV. CLOSURE SCHEDULE

- A. After suspension of manufacturing operations, additional wastes due to clean-up operations, etc. will be generated for a maximum of thirty (30) days.
- B. Upon suspension of manufacturing operations, all wastes will be treated within forty (40) days and removed from the premises within sixty (60) days.

V. COST ESTIMATES FOR FACILITY CLOSURE

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*****	Α.	Pick	le Liquor and Facilities	
		(1)	Labor costs for neutralization of acids and cleaning and removal of tank and exhaust system. 60 hours @ \$18/hr.	\$1060
-		(2)	Transportation, treatment, and disposal of 4000 gallons of neutralized pickle liquor. (4000 gal.) X (8.34 #/gal.) X (125/ton) : (2000 #/gal.)	2085
***		(3)	Transportation and disposal of pickle tank and exhaust system.	1200
			Subtotal	\$4365
	В.	1,1,	l Trichloroethane Facilities	
Accepts .		(1)	Labor costs for cleaning tanks. 24 hours @ \$18/gal.	432
		(2)	Credit for recovered solvent. 2000 gal. @ \$.60/gal.	(1200)
-		(.3)	Disposal of detergent rinse solution.	400
			Subtotal - Credit	(\$368)
•	C.	Mine	eral Spirits and Kerosene Facilities	
·· ············		(1)	Credit for solvent recoveries.	(\$125)
			Subtotal - Credit	(\$125)
estimate.	D.	Wast	e Oil Facilities	
-Ka		(1)	Labor to transfer oil from draw benches to waste oil tank, clean oil reservoirs, storage tank and impound area.	
			24 hours @ \$18/hr.	\$432
·		(2)	Transportation and disposal of waste oil.	400
			Subtotal	\$832
	E.	Dete	ergent Cleaning Solution Disposal	
reside		(1)	Transportation and disposal.	\$400
		,	Subtotal	\$400
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F.	Empt	y Drum Disposal	
	(1)	Cleaning of reusable drums by drum processor. \$10 each X 20 drums	\$200
	(2)	Crushing and disposal of non-reusable drums. \$15 X 15 drums	225
		Subtotal	\$425
G.	Admi	nistration Consultant Services & Contingencies	3
	(1)	Administration and supervision	\$300 0
	(2)	Professional engineer recommendations, inspection and certification.	5000
	(3)	Contingencies	2000
		Subtotal	\$10,000
н.	Tota	al Estimated Closure Cost - 4/2/84	\$15 , 529
			•

Harry L. Murphy Plant Manager

,Aemorandum

: Angelo Bellomo, Regional Administrator Toxic Substances Control Division Department of Health Services 107 South Broadway, Room 7128 Los Angeles, CA 90012 Date: May 4, 1984

From : California Regional Water Quality Control Board—Santa Ana Region
6809 INDIANA AVENUE, SUITE 200, RIVERSIDE, CA 92506 (ATSS) 632-4130

Subject: TRENT TUBE DIVISION (CAD 008325110) CLOSURE PLAN

We have received a closure plan for the Trent Tube Division Facility in Fullerton (a copy was sent to your office). It is our understanding that for storage facilities your office has approval authority for closure plans. We therefore are referring this matter to you for review.

We have, however, reviewed the plan and inspected the facility with respect to its impact on water quality. During the inspection, small areas of soil contaminated with waste oil were noted on the south side of the plant. Mr. Harry Murphy, Plant Manager, stated that soil in these areas will be removed to a depth of three feet during closure. This is not included in the closure plan.

With the above exception, no problems were noted during the inspection or in our review of the closure plan as submitted. If you have any questions on this matter, please contact Kurt Berchtold of my staff.

Original Signed by

JAMES W. ANDERSON Executive Officer

cc: Wobert M. Phillips, Trent Tube Division Harry Murphy, Trent Tube Division Fred Lercari, SWRCB - DTS

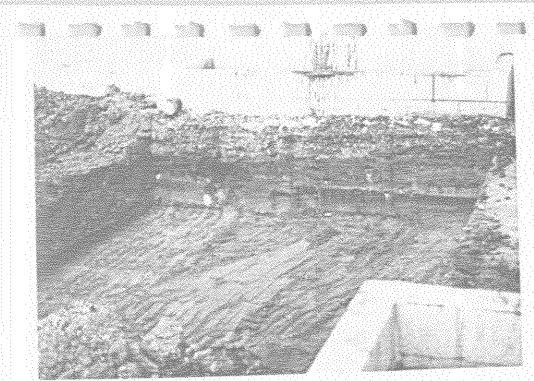
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APPENDIX D

PHOTOS OF EXCAVATED AREAS AND

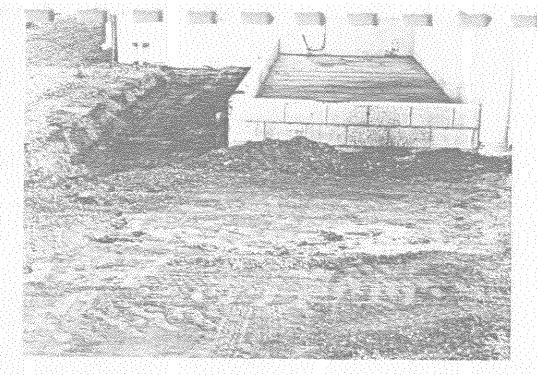
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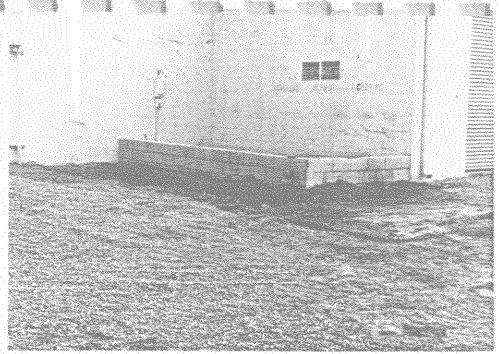
DURING INITIAL CLOSURE - MARCH-MAY 1984

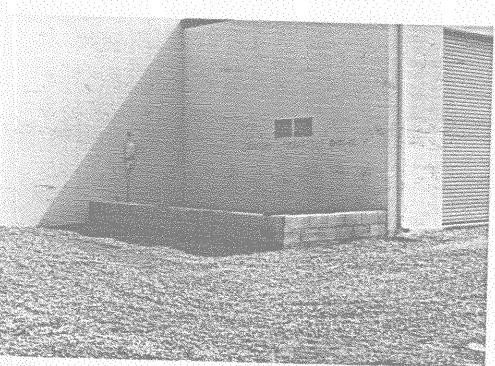














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UNIFORM HAZARDOUS WASTE MANIFEST

Michell Springs Cold

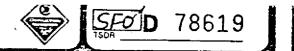
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	AREA CODE/PHONE NUMBER CA. 92634 (74)	526-	5.52.2 VEH./CO	CA.DO	083	25/ EPA	ID NUI	MBER _	<u></u>
	Rutherford / Pachic 3000 Crains plus Long Beach Ca 90807 213 915-9461		oon	HI3 IS D	DKA	W A K	10 17	J1710	113
	TRANSPORTER NO. 2/ALTERNATE TSD FACILITY		V.EH./CO	ONTAINER NO	. <u>. </u>	EPA	ID NU	MBER	<u> </u>
	TREATMENT. STORAGE, OR DISPOSAL (TSD) FACILITY			<u> </u>		EPA	ID NU	MBER	<u></u>
	Facet Spergy 300 Orange Ave Long Brack a 90 yo7 213.595-733	·			A	: Dan	א מי	100	
	PROPER U.S. D.O.T. SHIPPING NAME AND HAZARD CLASS	NOWBE	•	TOTAL QUANTITY	UNIT WT/VOL	CONTA NO.	INER	WASTE CAT. NO	E DI
	WASTE ON COMBISTABLE NOS. N	A/2	70	1/65	Gal	ווסס	CT	221	0
	COMPONENTS		<u> </u>		CONC UPPER	RANGE LOW	EA	UNIT	TS PPN
	Recyclable oil	/			100			•	
	SPECIAL HANDLING INSTRUCTIONS		· · · · · · · · · · · · · · · · · · ·					v	
	This is to certify that the above-named wastes are properly classified, described, pace proper condition for transportation according to the applicable requirements of the Dep	artment of	irked and li Transporta	abeled, and artition and the E	PA -	10.	DAY		YR.
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	DISCREPANCY INDICATION SPACE							,	
	Facility owner or operator: Certification of receipt of hazardous waste covered by this discrepancy indication space above. Note: TSDF must complete waste number. See instructions. Printed or typed full name and apparture		PA ID NUM			ATE RECE	DAY		YR.
DH	S 5022A 11/82 TSDF SENDS THIS COPY TO G	FNFDA'	TOR W	ITHIN 15	DAYS			L	3.,

Sacramento, CA 95814

UNIFORM HAZARDOUS WASTE MANIFEST

83170055 lease print or type with ELITE type (12 characters per inch). STATE ID NUMBER GENERATOR NAME AND MAILING ADDRESS -CAMPIECE OFER CORD MANIFEST DOCUMENT NUMBER TREMO TRIES 211 EPA ID NUMBER FILLERIUM, CA 926 34 フリター コンモーリラスズ AREA CODE/PHONE NUMBER TRANSPORTER NO. 1
LIGHTO WHATE MIKAGEMENT VEH/CONTAINER NO. TREY 10 9 800-124-3345 1/1/17/45/4/17/08/01/03/4/18/4 ONTAINER NO. EPA ID NUMBER TRANSPORTER NO. 2/ALTERNATE TSD FACILITY V.EH./CONTAINER NO. TREATMENT, STORAGE, OR DISPOSAL (TSD) FACILITY CHEATHER GOVERNOR OF THE AND SELECT KETTLEININ HILLS INC. 2551 Des France 15 GENERATO THEORY CAR OF AREA CODE/PHONE NUMBER UN/NA TOTAL UNIT CONTAINER PROPER U.S. D.O.T. SHIPPING NAME AND HAZARD CLASS NUMBER QUANTITY WT/VOL NO. | TYPE CAT. NO METH CONC. RANGE UNITS COMPONENTS UPPER LOWER PPM CHE SINCHIL · 240 1200 . 🛈 NIFEL × エバンベ 4 40 1. 175 FULLIDEIDE MITHELL JAVIA AMINGARING FLUDRICE SPECIAL HANDLING INSTRUCTIONS GLOVET + GORGLES 1-12 OF169 This is to certify that the above-named wastes are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable requirements of the Department of Transportation and the EPA. MO. DAY Printed or typed full name and signature ☐ Check if continuation sheet is used. Number of continuation sheets TRANSPORTER 1 ACKNOWLEDGEMENT OF RECEIPT OF ABOVE WASTES BE FILLED IN TRANSPORTER DATE MO. DAY VR. Printed or typed full name and signature & ACCEPTED CIS MO. TRANSPORTER 2 ACKNOWLEDGEMENT OF RECEIPT OF ABOVE WASTES DATE REC'D 유 Printed or typed full name and signature ACCEPTED DISCREPANCY INDICATION SPACE y motor of 6 FILLED 8E ₽ Facility owner or operator: Certification of receipt of hazardous waste covered by this manifest except as noted in the discrepancy indication space above. Note: TSDF must complete waste number. DATE RECEIVED & ACCEPTED FPA ID NUMBER МО DAY Printed or typed full name and signature RM NO DHS-8022A 11/82 TSDF SENDS THIS COPY TO GENERATOR WITHIN

Waste Wanagement, Inc. GENERATOR'S WASTE MATERIAL PROFILE SHEET



A GENERAL INFORMATION	
GENERATOR NAME TRENT TUBE DIV PRINTER	EOR CORTRANSPORTER LIQUID WASTE MANGENT
FACILITY ADDRESS: 2100 E. ORANGE THORP	THE STATE OF THE S
FULL ECTIVITY ADDRESS: LOVE TO CONTROL PARTY ADDRESS: LOVE TO	TRANSPORTER PHONE: OUU - SULF-JUTS
LI GLLEKTUN CAT 72634	GENERATOR USEPA I.D. CADO 0.8.3.2.51.10
41 Minorio	GENERATOR STATE I.D. SAME
	TLE QAMER J PHONE 74-536-5522
NAME OF WASTE LATELITIEN JOE NITRIC ACK	
PROCESS GENERATING WASTE: PICKLING OF STAIR	LESS STEFLS
B PHYSICAL CHARACTERISTICS OF WASTE	
COLOR COOR NONE O MILD PHYSICAL S	TATE & 70°F LAYERS
	MULTILAYERED FREE LIQUIDS
SIRONG	SEMI SOLID K BI-LAYERED KYES NO
DESCRIBE AMANUA X LIQUID	POWDER SINGLE PHASED VOLUME 100 %
pH: □< 2	3-1.4 FLASH < 70°F > 200°F CLOSED CUP
GRAVITY	POINT
7	140°F-200°F
C CHEMICAL COMPOSITION (TOTALS MUST ADD TO 100%)	
TOTAL CHRONIUM Q.215	D METALS TOTAL (PPM) SEPA EXTRACTION PROCEDURE (mg/L)
MCKEL- 10,225	3
	BARIUM (Ba) L SILVER (Ag) L
	CADMIUM (Cd) COPPER (Cu) COPPER (Cu)
FLUORIDE 1.58	NICKEL (NI)
LAMOSISA 2.14	MERCURY (Hg) ZINC (Zn)
AMMONIAM FLYDRINE 3.08	THALLIUM(TD)
· · · · · · · · · · · · · · · · · · ·	CHROMIUM-HEX (Cr + 6) 1 360 EST. IEW 5496
FALANCE H20	E OTHER COMPONENTS - TOTAL (PPM)
	CYANIDES PCB'S
	SULFIDES O - PHENOLICS O -
F SHIPPING INFORMATION	G HAZARDOUS CHARACTERISTICS
D.O.T. HAZARDOUS MATERIAL? XYES NO	
PROPER SHIPPING NAME HAZALOSUS (USTE LIQUIDNOS)	
HAZARD CLASS (ORN-E) I.D NO MAGI89 RO	OTHER HAZARDOUS CHARACTERISTICS.
METHOD OF SHIPMENT. X BULK LIQUID BULK SOLID	NONE RADIOACTIVE ETICLOGICAL
GORUM (TYPE/SIZE)	PESTICIDE MANUFACTURING WASTE OTHER
ANTICIPATED VOLUME (3500) GALSCUBIC YARDS	USEPA HAZARDOUS WASTE? X YES NO
ن OTHER	USEPA HAZARDOUS CODE(S. 2007)
PER XONE TIME 🗍 WEEK 🔲 MONTH	STATE HAZARDOUS WASTE? XYES NO
OUARTER YEAR	STATE CODE(S) LAME
H SPECIAL HANDLING INFORMATION	THE FON A RUPBER OF OUT
The state of the s	WESTER VIOLES
	ADDITIONAL PAGEIS) ATTACHED
I HEREBY CERTIFY THAT ALL INFORMATION SUBMITTED IN THIS AND ALL ATTACHED SUSPECTED HAZARDS HAVE BEEN DISCLOSED.	DOCUMENTS IS COMPLETE AND ACCURATE AND THAT ALL KNOWN OR
AUTHORIZED SIGNATUME TITLE	DATE
11/ (2-0 0	
Harry XTI wepky 2.	ality Currence Mary 5/17/84
	The state of the

SALES	CODE							
	D	78619						
WASTE PROFILE SHEET CODE								

CERTIFICATION OF REPRESENTATIVE SAMPLE

GENERAL DIRECTIONS: IN ORDER TO DETERMINE WHETHER WE CAN ACCEPT THE SPECIAL WASTE DESCRIBED IN THE ABOVE NUMBERED PROFILE SHEET, WE MUST OBTAIN A REPRESENTATIVE SAMPLE OF THE WASTE. WE WILL ANALYZE THE SAMPLE TO VERIFY THE INFORMATION YOU HAVE PROVIDED US, SO IT IS PARTICULARLY IMPORTANT THAT THE SAMPLE BE TRULY REPRESENTATIVE. IN MOST CIRCUMSTANCES YOU WILL BE OBTAINING THE SAMPLE. HOWEVER, IN THOSE CASES IN WHICH WE OBTAIN THE SAMPLE, WE MUST ASK THAT ONE OF YOUR EMPLOYEES BE PRESENT TO DIRECT THE PARTICULAR SOURCE TO BE SAMPLED AND TO WITNESS THE SAMPLING. IN SUCH CASE, YOUR EMPLOYEE MUST SIGN THIS CERTIFICATION AS A WITNESS.

YOUR EMPLOYEES BE PRESENT TO DIRECT THE PARTI- SAMPLING. IN SUCH CASE, YOUR EMPLOYEE MUST SIG	CULAR SOURCE TO BE SAMPLED AND TO WITNESS THE GN THIS CERTIFICATION AS A WITNESS.
THIS CERTIFICATION MUST BE RETURNED, WITH THE R	REPRESENTATIVE WASTE SAMPLE, TO: CHEMICAL WASTE MANAGEMENT, INC.
EXCLUSIVE PROPERTY OF CHEMICAL WASTE MANAGEMENT INC. OAK BROOK, I	
Not to be reproduced without specific written permiss:	P. O. BOX 471, 35251 OLD SKYLINE ROAD
from an authorized representative.	KETTLEMAN CITY, CA 93739
THE UNDERSIGNED CERTIFIES THAT HE/SHE OBTA	INED A REPRESENTATIVE SAMPLE OF THE WASTE MATERIAL PROFILE SHEET" ABOVE REFERENCED, AND AND CORRECT:
1. HOUR AND DATE OF SAMPLING:	4/30/84 10:00 AM
2. SOURCE FROM WHICH SAMPLE TAK	
- Stanfeed (tan	
3. EQUIPMENT AND SAMPLING METHO	
5. EQUIPMENT AND SAMPLING METHO	o Sampling (DINI) At
attrana diot	W. The property of
/	0 - 0
4. AMOUNT OF SAMPLE OBTAINED:	
5. TYPE OF CONTAINER INTO WHICH S.	AMPLE WAS PLACED:
S THE CAMPING FOURTH	
PLACED, WERE THEMSELVES UNCO	AND THE CONTAINER INTO WHICH THE SAMPLE WAS NTAMINATED BEFORE USE.
7. AT THE TIME OF SAMPLING I AFFIX	ED A LABEL TO THE CONTAINER IN THE FOLLOWING DEMATION (FILL IN THIS PORTION INCLUDING YOUR
GENERATOR: Crant of Waste NAME: Generator: G	Gira Titricacia) 36/84 10:00 Am
WITNESS VERIFICATION: I WAS PERSONALLY PRESENT DURING THE SAMPLING DESCRIBED; I DIRECTED THE WASTE SOURCE TO BE SAMPLED; AND I VERIFY THE INFORMATION ABOVE NOTED.	SAMPLER NAME: Harry & Murshy SIGNATURE: Harry & Murshy
WITNESS: MEZUIN W SHORT	HILE Mor Quality Accuracy
SIGNATURE: / Phin W Alux	EMPLOYER Trent Tilber Din
TITLE: BUYER	DATE: 5/17/84
EMPLOYER: Trent Tube	LABORATORY REVIEW OF SAMPLING PROTOCOL.
5/12/01	BASED UPON MY REVIEW OF THE ABOVE PROFILE SHEET, I CONCLUDE THAT THE ABOVE METHODOLOGY IS:
DATE: 2/1/84	☐ ADEQUATE FOR YIELDING A REPRESENTATIVE SAMPLE.
	D INADEQUATE FOR THE REASONS NOTED HEREON.
	DATE:
FORM WMI-51 (Rev. 8/83)	LAB MGR:



ASSOCIATED LABORATORIES

806 North Batavia - Orange, California 92668 - 714/771-6900

CLIENT

Industrial Waste Utilization

LAB NO.

E04364

P. O. Box 1163 Brea, Ca. 92621

Attn: Chuck Templer

REPORTED

5/10/84

SAMPLE

Neutralized Nitric Acid

RECEIVED

4/30/84

IDENTIFICATION

Trent Tube, 2100 E. Orangethorpe,

Fullerton, Ca.

w/Hydrofluoric

BASED ON SAMPLE

As Submitted

pН

6.1

Specific Gravity

1.80 (Hydrometer)

Total Chromium

0.245 %

.00245 = 2450ppm

Nickel

0.225 %

Iron

0.458 %

Fluoride

1.58 %

Ammonia

7.14 %

Ammonium Fluoride

3.08 %

ASSOCIATED LABORATORIES

Edward S. Behare, Ph.D.

ESB/jg

TESTING & CONSULTING

Chemical •

Microbiological ·

Environmental •

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37		,		ו מנו מ
New Permit	_			Permit # 3-496
•	(Current Permit No.			Date Handled 5///
	(Current Permit No. 3-3		- <u>26-83</u>)Issue	Date Sent 5///
Verbal Permit () (If given verbal	No. Date emergency permit by teleph		Departm	ent of Health Services
	CALIFORNIA	DEPARTMENT	NE REALTH CHAZARDO	US WARRY MARACTMEN
		Section Offi	Los Arge	th Breadyny, Room 7128 eles, CA 50012
4/744 P Street cramento, CA 95814	2151 Berkeley Way Berkeley, CA 94704	5545	East Shields Avenue	107 South Broadway Rm. 7012
16) 322-2337	(415) 540-2043	(209) 291-66 76	Los Angeles, CA 9001 (213) 620-2380
	CALIPORNIA EXTRE	APPLICATION MELY HAZARDO	FOR US WASTE DISPOSAL PE	RМП⇒
Please type or permit. Allow 15	o days process time from di	sy of receipt.		result in delay or denial of
ASTE PRODUCER:		INDUSTRIES IT TUBE DIVIS	- CRUCIBLE OPERA	ATING DIV. INC.
	Street and No. (Or P.O. B	ox) P.O. BO	(3068 - 2100 E.	ORANGETHORPE AVENUE
	City FULLERTON	State	CA	Zip Code 92634
	Telephone No. 714) 5	26-5522	County ORAN	
	Pick Up Address (If Differ	ent)		
	Applicant HARRY L.	MURPHY	Title MANAGER OF	QUALITY ASSURANCE
ROPOSED HAULER:	LIQUID WASTE MAN	AGEMENT	(SECONDARY) INDUSTRIAL	WASTE UTILIZATION
	1369 W. 9th STRE	ET	P.O. BOX 11	63
	UPLAND, CA 9178	6	BREA, CA	2621
	800-824-3345		714-529-323	37
	CAT 080034184		CAD 9805852	93
			Hauler Reg. No.	
ROPOSED DISPOSAL			*Ar	nended
R OTHER) PACILITY:	CASMALIA RESOU	RCES	(ALT) KETTLEM	AN_HILLS
	CASMALIA, CA		P.O. BOX	(1104
			COALING	A, CA 93210
			CAT00064611	7
OPOSED METHOD	Y			· .
DISPOSAL:	Burial Ponding X Stor			ICADCIII ATTON
	Treatment (Specify type)			
	Recycle (Specify method of	reuse)		

CALIFORNIA DEPARTMENT OF HEALTH SERVICES Hezardous Materials Management Section

APPLICATION FOR CALIPORNIA EXTREMELY HAZARDOUS WASTE DISPOSAL PERMIT

DESCRIPTION OF WASTE			CONCENT	RATION		QU	ANTITY
(Including Composition with Upper and Lower Concentra of Hazardous Components)	rtion .	Lower	Upper	Units, % or ppn	1	estimat	r's permit giv ed quantity p and per yea
AMMONIUM BIFLUORIDE	<u>.</u>	0	400_	. ppm			POUNDS
			·		_		
					_		
	_			· · · · · · · · · · · · · · · · · · ·			
		(Attach pag	e(s) for odditio	nai wastes)			·· · - ·· · · · · · · · · · · · · · · · · ·
DESCRIPTION OF PACKAGIN	NG: (Packa	gin g, C ontaine	٠				
Drums				Tank Truck X			
Other							
	Specif	y merupa of t	ockoging small	containers			
Pockaging, containerization, a hazardous materials, and with transport of hazardous materi CFR Part 761.							
PERMIT TO BE USED FOR:	(Length of Tin	ie)					
		•					
	Single Disposal						
	Single Disposal	<u>x</u>	tiple Disposals				
PERMIT RENEWALS: (Applic prior to expiration date to ke	One Year Max	X imum for Mul			must be recei	ived at l	east 15 days
PERMIT RENEWALS: (Applic prior to expiration date to ke Signature of Applicant	One Year Max oution for renewa	X imum for Mul		it, using this form,	must be recei		eost 15 days
prio w expiration take to ke	One Year Max oution for renewa	X imum for Multiple of a one-year ect.	r tionket perm	hit, using this form,			east 15 days

1/22/81

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		BHANCH		344	Department II Naidth Services
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-		This is to certify that the above named wastes a proper condition for transportation according to the	re properly classified, described, packaged, mar e applicable acquirements of the Dipartment 6()	rkeo and i ≸rensporta	ition and the EPA. (1) 1900 (1) 1900 (1) 1900 (1)
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APPENDIX E

CERTIFICATION OF CLOSURE
AUGUST 29, 1984



Calocerinos & Spina consulting Engineers

1020 Seventh North Street, Liverpool, NY 13088 • (315) 457-6711

August 29, 1984

Mr. Angelo Bellomo Regional Administrator Toxic Substances Control Division Department of Health Services 107 South Broadway, Room 7128 Los Angeles, California 90012

> Re: Closure Certification Trent Tube Facility Fullerton, California

CAD 008325110

Dear Sir:

On August 16, 1984, Mr. Richard Klippel, P.E., of Calocerinos & Spina, Consulting Engineers, inspected the vacant Trent Tube Division Plant at 2100 East Orangethorpe Avenue, Fullerton, California.

Based on his inspection of the physical facilities, as well as photographs, manifests and billing records, we hereby certify that the Facility has been closed in accordance with the "Closure Plan" submitted by Trent Tube Division to your office on April 1, 1984.

The closure activities also included removal of the top three (3) feet of oil-contaminated soil on the two (2) areas on the south side of the Plant which were referenced in Mr. James Anderson's memo to you of May 4, 1984.

We therefore request that you delete the Interim Status Permit for this Facility from your records.

For:

TRENT TUBE DIVISION CRUCIBLE MATERIALS CORP.

D. R. Gehr Vice President Technical Services

CC: Mr. James Anderson
Executive Officer
Regional Water Quality Board
Suite 200, 6809 Indiana Street
Riverside, California 92506

Mr. Harry Murphy, Trent Tube Div.

For:

CALOCERINOS & SPINA CONSULTING ENGINEERS

Frank J. Spina, P.E.

Partner





Calocerinos & Spina consulting Engineers

1020 Seventh North Street, Liverpool, NY 13088 • (315) 457-6711

December 13, 1984

Mr. Angelo Bellomo Regional Administrator Toxic Substances Control Division Department of Health Services 107 South Broadway, Room 7128 Los Angeles, California 90012

> Re: Closure Certification Trent Tube Facility Fullerton, California CAD 008325110

Dear Sir:

On August 16, 1984, Mr. Richard Klippel, P.E., of Calocerinos & Spina, Consulting Engineers, inspected the vacant Trent Tube Division Plant at 2100 East Orangethorpe Avenue, Fullerton, California.

Based on his inspection of the physical facilities, as well as photographs, manifests and billing records, we hereby certify that the Facility has been closed in accordance with the "Closure Plan" submitted by Trent Tube Division to your office on April 1, 1984.

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We therefore request that you delete the Interim Status Permit for this Facility from your records.

For:

TRENT TUBE DIVISION CRUCIBLE MATERIALS CORP.

D. R. Gehr Vice President Technical Services

CC: Mr. James Anderson
Executive Officer
Regional Water Quality Board
Suite 200, 6809 Indiana Street
Riverside, California 92506

Mr. Harry Murphy, Trent Tube Div.

For:

CALOCERINOS & SPINA CONSULTING ENGINEERS

Frank J. Spina

Partner

ANY JOSE

No. 39026

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APPENDIX F

LETTER COMMENT BY DEPARTMENT OF HEALTH SERVICES

AND

PROPOSED SITE ASSESSMENT PLAN

DEPARTMENT OF HEALTH SERVICES

107 SOUTH BROADWAY, ROOM \$128 LOS ANGELES, CA 90012



December 3, 1984

Mr. Robert M. Phillips Trent Tube Division Crucible Materials Corp P.O. Box 88 Pittsburgh, PA 15230

Dear Mr. Phillips:

CLOSURE PLAN DEFICIENCIES RE: CLOSURE OF TRENT TUBE FACILITY, FULLERTON, CA (CAD 008325110)

The closure plan you submitted on August 24, 1983 regarding the subject facility is inadequate. Therefore, the subsequent closure certification is inappropriate.

You are directed to submit to this office by December 15, 1984 a revised written site assessment plan prepared by an independent engineer registered in the State of California.

The plan must provide for sampling and chemical assessment of all areas which were excavated at the direction of the California Regional Water Quality Control Board and all other areas that could be contaminated with hazardous wastes. Areas where chlorinated solvents were used, stored, or may have been spilled are of particular concern. The plan must identify all principals, including the analytical laboratory and all other contractors used. Drawings, sketches and/or photographs necessary to fully describe areas of concern and proposed remedial actions should also be included.

The assessment plan must be approved by this office prior to any further construction, excavation or other work in the affected areas.

If you have any questions or wish to further discuss this matter please call

Roy Thielking of my staff.

John Hinton, P.E., Manager Facility Permitting Unit Southern California Section

Toxic Substances Control Division

JH:RT:kp

cc: See attached list

CERTIFIED

James Anderson, Executive Officer California Regional Water Quality Control Board Santa Ana REgion 6809 Indiana Ave., Suite 200 Riverside, CA 92506

Harry Murphy \
Trent Tube Division
Colt Industries Operating Corporation
430 Park Avenue.
New York, NY 10022



Calocerinos & Spina consulting Engineers

1020 Seventh North Street, Liverpool, NY 13088 (315) 457-6711

December 18, 1984

Mr. Roy Thielkin
Project Manager
Facility Permitting Unit
Southern California Section
Toxic Substances Control Division
Department of Health Services
107 South Broadway, Room 7128
Los Angeles, California 90012

Re: Site Assessment Plan Trent Tube Plant Fullerton, California CAD 008325110

File: 469.003

Dear Mr. Thielkin:

In accordance with Mr. Hinton's letter of December 3, 1984, and our discussion during the meeting in your office on December 14, 1984, we are hereby submitting a Site Assessment Plan for the Trent Tube Division Plant at 2100 East Orangethorpe Avenue, Fullerton, California.

As you will note, we anticipate performing the site borings during the period of December 26-28, 1984. We would therefore appreciate receiving your comments at the earliest possible time.

Please feel free to call us if you have any questions or need additional information.

Very truly yours,

CALCCERINOS & SPINA

PWKints

Richard W. Klippel, P.E. Industrial Waste Manager

Enclosure

CC: W. Smith, Esq. (w/ enc.)

Mr. D. Bramwell, IT Corp. (w/enc.)

Mr. R. Phillips, Trent Tube (w/enc.)

Mr. J. Devaney, Colt Industries

SITE ASSESSMENT PLAN TRENT TUBE DIVISION PLANT 2100 EAST ORANGETHORPE AVENUE FULLERTON, CALIFORNIA

CAD 008325110

I. <u>Background Information</u>

Trent Tube Division of Crucible Material Corporation ceased operation of their manufacturing facility at 2100 East Orangethorpe Avenue, Fullerton, California, on March 11, 1984. In accordance with Article 4, para. 66402, of the California Waste Management Regulations, notice of the anticipated closure along with a Closure Plan and cost estimate plus a copy of the Operation Plan were submitted to the California Department of Health Services by certified letter on August 24, 1983. No comments on that submittal were received.

From March 28-30, 1984, Mr. Richard W. Klippel, P.E., of Calocerinos & Spina, Consulting Engineers, and Robert Phillips of Trent Tube inspected the Plant and assisted Mr. Harry Murphy, Plant Manager, in updating and revising the Closure Plan and cost estimate. On March 29, 1984, Mr. Klippel and Mr. Phillips met with Mr. Kurt Burchtold of the Santa Ana Regional Water Quality Control Board to discuss the pending Plant closure and submittal of the notice and revised Closure Plan. Mr. Burchtold advised Trent Tube to submit the Plan to both the Water Quality Control Board and the California Department of Health Services for review.

On April 1, 1984, in accordance with provisions of Attachment A, Section V, of the Interim Status Document, CAD 008325110, the Revised Closure Plan and cost estimate were submitted by certified letter to the Santa Ana Regional Water Quality Control Board. As per Mr. Burchtold's

recommendation, a copy of the Plan was sent to the Department of Health Services. That Closure Plan identified the actual closure date of May 11, 1984.

On May 4, 1984, Trent Tube received a copy of a memo from the Regional Water Quality Control Board to the Department of Health Services referring closure approval for the facility to the Department of Health Services.

In that memo, the Regional Water Quality Board stated that no problems were noted during their inspection of the facility or in their review of the Closure Plan, with one exception. That exception involved small areas of soil contaminated with waste oil which were noted on the south side of the Plant during their inspection. Their memo notes that the Plant Manager, Mr. Harry Murphy, stated that, during closure, the soil in these areas would be removed to a depth of three (3) feet.

On May 11, 1984, Trent Tube ceased manufacturing at the facility and during the remainder of the month, closure activities as described in the Closure Plan were carried out under the supervision of Mr. Harry Murphy. As agreed in his meeting with the Regional Water Quality Control Board staff, the two small areas of soil stained by waste oil were excavated to a depth of three (3) feet and the excavations were filled with clean crushed stone.

On August 16, 1984, Mr. Richard Klippel under the direction of Mr. Frank Spina, California P.E. #39026, Partner, Calocerinos & Spina, Consulting Engineers, inspected the vacant and closed facility and reviewed photographs, manifests and billing records pertaining to the closure activities. On August 29, 1984, Mr. Frank Spina on the basis of Mr. Klippel's inspection, certified by letter that the facility was closed in accordance with the Closure Plan dated April 1, 1984.

II. Purpose of Plan Submitted

On December 12, 1984, the appropriate Trent Tube personnel received a letter dated December 3, 1984, from the California Department of Health Services, Facility Permitting Unit, advising the company that the Closure Plan was inadequate and the subsequent closure certification inappropriate. The letter directed that a written Site Assessment Plan, prepared by an independent engineer registered in the State of California, be submitted to their office by December 15, 1984. The letter further stated that the Plan must provide for sampling and chemical assessment of all areas which were excavated at the direction of the Regional Water Quality Control Board and all other areas that could be contaminated with hazardous wastes. The Plan must identify all principals, including the analytical laboratory, and all other contractors used. The Plan should also include drawings, sketches and/or photographs necessary to fully describe areas of concern and should propose remedial actions that would be taken if found to be necessary.

On December 14, 1984, officials of Trent Tube, Calocerinos & Spina, Consulting Engineers, and Wayne Smith, Esq., of Gibson, Dunn and Crutcher, Attorneys, met with Mr. Roy Thielkin of the Facility Permitting Unit staff and discussed the matter in some detail. At that meeting, it was agreed that Trent Tube would proceed with the submittal of the Site Assessment Plan and the subsequent execution of the activities upon Plan approval. Since Trent Tube has a purchase offer for the property and considers time to be of the essence, they requested that Mr. Thielkin publish the required public notice at the earliest opportunity. Furthermore, it was agreed that Trent Tube would attempt to complete the site evaluation procedure to the Department's satisfaction prior to the expira-

tion of the required 45-day public comment period. Thus, by approximately February 1, 1985, closure certification could be accomplished thereby allowing closing on the sale of the property.

This Site Assessment Plan is submitted in response to the December 3, 1984, letter request by the Department of Health Services and is specifically tailored to provide the information requested in that letter.

III. Goals of the Site Assessment Plan

The goal of the proposed Site Assessment Plan is to ascertain the presence of hazardous waste constituents in the soil at the Trent Tube facility and to recommend and implement necessary remediation if such materials are found to be present.

IV. Specific Location To Be Assessed

The initial site locations to be assessed are shown as locations A-1, A-2 and A-3 in Figure 1, attached, and are shown pictorially in Figures 2 and 3. The locations shown are those which were excavated at the direction of the Regional Water Quality Control Board. These areas are in close proximity to each of the diked areas where hazardous substances and/or hazardous wastes were stored and represent areas where previous excavation was carried out to remove soil which was visibly stained with oily substances. Specific sample sites in each area were selected to characterize those areas which were visibly contaminated and are generally located near the diked areas and opposite the locations of the dike drains which were periodically opened to remove trapped rainwater from the diked areas.

V. Assessment Procedure

At each of those locations shown in Figure 1 (A-1, A-2 and A-3), it is proposed that soil samples be obtained utilizing a 2-inch diameter

Modified California Sampler. Samples would be collected at three depths at each location. The upper depth would be at the top layer of soil directly beneath the recent excavation which would be approximately 3 feet deep. Additional samples at each location would be obtained at depths of 5 feet and 10 feet. Recent structural borings in the Plant yard confirm a thick layer of sand beneath the site with a water depth of greater than 25 feet.

Samples at each location would consist of a 6-inch long undisturbed soil sample contained within a capped section of 2-inch pipe. The sampling rig would be thoroughly decontaminated between samples and boring holes will be filled with a bentonite clay slurry upon completion.

Samples would be shipped in the sample collection cylinder and refrigerated until analysis. Samples would be delivered to the analytical laboratory on the same day and analyzed within 72 hours of collection. Each sample would be analyzed for the following constituents which were present in the hazardous wastes stored in the adjacent storage areas.

<u>Waste</u>	Target Parameter	Method
Chlorothene VG	1,1,1,Trichlorothane	GC - USEPA Method 601
Blended Solvents	Methylene Chloride	GC - USEPA Method 601
Mineral Spirits		
and Kerosene	Benzene, Toluene, Xylene	GC - USEPA Method 602

Results will be reported in terms of mg/kg (wet weight) as received.

To establish background concentrations in the area, additional samples at the same approximate depths will be taken in three (3) other

locations on the Plant site remote from the waste storage areas. These additional locations are labelled B-1, B-2 and B-3 on Figure 1. These nine samples would be analyzed for the same parameters.

In the interest of time, it is proposed that additional soil samples be collected at downgradient locations at increasing distances from the waste storage areas in order to determine the areal extent of any contamination that might be found. Such samples would be taken at the 3, 5 and 10-feet depths but would only be analyzed if significant contamination were found to exist in the initial set of samples (A-1, A-2 and A-3) adjacent to the waste storage areas. Analyses of these samples would be carried out within 14 days of collection and these samples would be kept refrigerated during the intervening period.

Analytical results of the A-1, A-2 and A-3 samples will be evaluated and compared against the analyses of the background samples (B-1, B-2 and B-3) at comparable depths. If the contaminants are found to exist in the A series samples in concentrations statistically higher than in the background (B series) samples, the same analyses would be performed on the samples taken at a greater distance from the storage areas (C series). If contamination is found in the C series samples, the D series of samples taken near the property line will be analyzed. The composite set of analytical results will then be utilized to determine the areal extent of any remediation that may be required. Such remediation, depending upon the nature and extent of any contamination found, may include either removal of contaminated soil to a secure disposal site or surface spreading and natural volatization of the contaminants.

The results of the assessment including all analytical data, chainof-custody sheets, maps and sketches as well as recommendations arising

from the assessment will be documented in a Site Assessment Report which will be promptly submitted to the Department of Health Services.

VI. Principals Involved In the Assessment Process

Certified Independent Engineer - Frank J. Spina, Calif. P.E. #39026

Principal Site Coordinator

- Andrew F. Diefendorf, CPG (C&S)

Drilling Company

- Pioneer Drilling Company Redlands, Calif.

Analytical Laboratory

- California Analytical Services Sacramento, California

Soil Sampling

- Mr. David Bramwell, CEG IT Corporation, Irvine, California

Data Evaluation

- Richard W. Klippel, P.E. (C&S)

VII. Projected Date of Assessment Effort

- Submit Assessment Plan 1.
- 2. Obtain Boring Samples
- 3. Analysis of Samples
- 4. Evaluation of Results
- 5. Submittal of Assessment Plan -
- 6. Remediation of Site, if necessary

December 19, 1984

December 26, 27 and 28, 1984

December 27-28, 1984

January 2-15, 1985

January 15, 1985

January 15-30, 1985

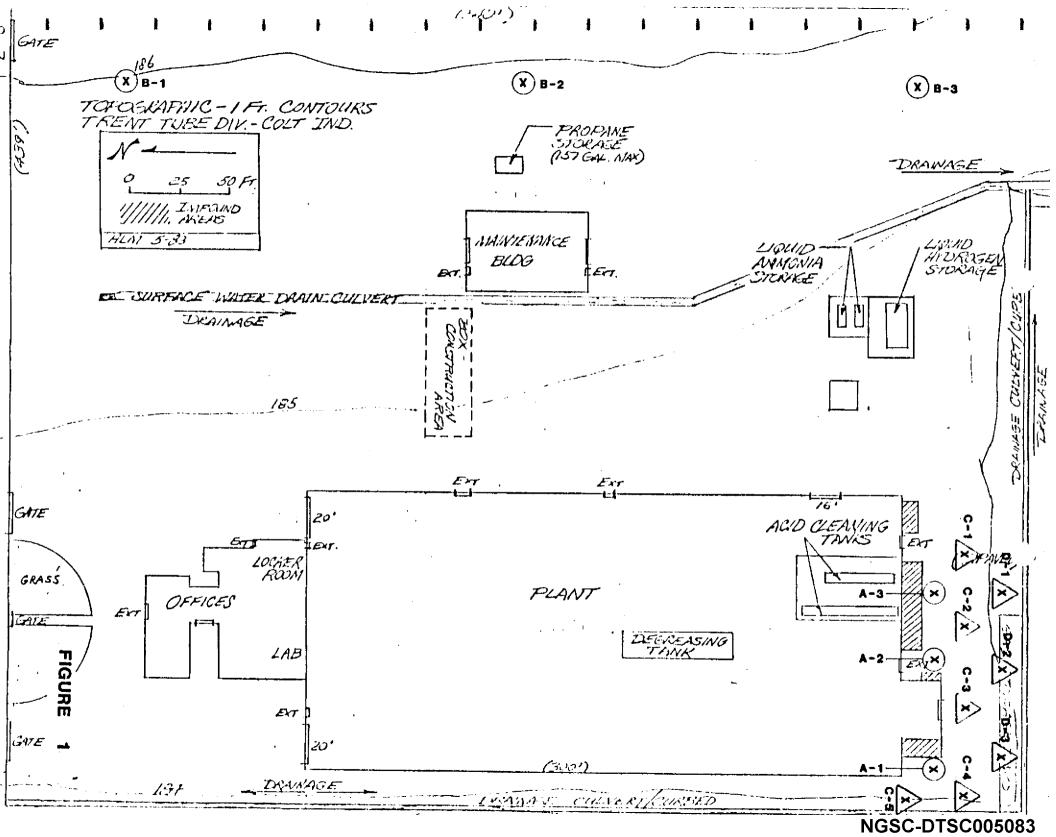
Respectfully submitted,

CALOCERINOS & SPINA

Partner

FJS:RWK:mts

Attachments



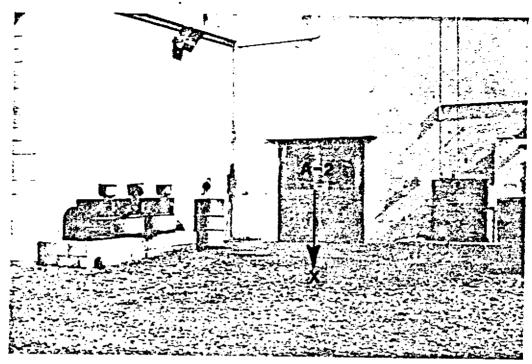


Figure 5 - Waste collection impound at south end of facility. Impounded drums contain waste 1,1,1 trichloroethane, waste kerosene, and waste mineral spirits.

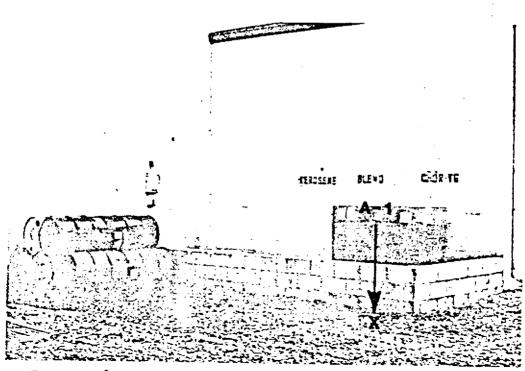


Figure 6 - Waste storage impound at southwest corner of plant. Non-impounded drums are empty.

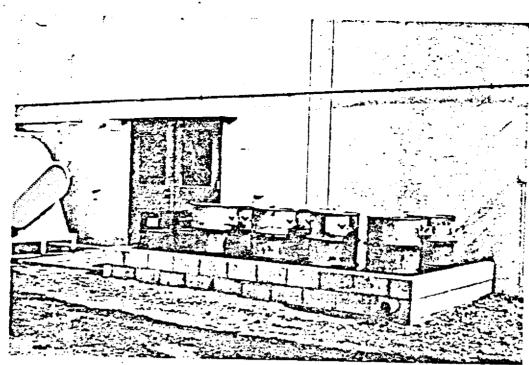


Figure 3 - Impound located at scutheast corner of the plant used to store concentrated acids.

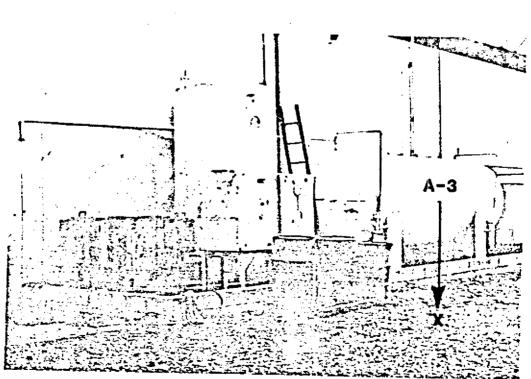


Figure 4 - Impound located at south end, center of plant. Tanks from left to right, store waste oil, waste detergent, unused 1,1,1 trickloroethane, kerosene and 1,1,1 trickloroethane. Drums contain kerosene to be stored in the kersone tank.

APPENDIX G

PROPOSED SITE REMEDIATION PLAN



Calocerinos & Spina consulting Engineers

1020 Seventh North Street, Liverpool, NY 13088 - (315) 457-6711

January 18, 1985

Mr. Roy Thielking Project Manager Facility Permitting Unit Southern California Section Toxic Substances Control Division Department of Health Services 197 Broadway, Room 7128 Los Angeles, California 90052

> Re: Site Remediation Plan Trent Tube Plant Fullerton, California

CAD 008325110

File: 469.003

Dear Mr. Thielking:

We have completed our site assessment for the above-referenced Project and present herein the results of that assessment and our proposed plan for remediation of the site.

Site Sampling

A total of 14 borings were completed as originally proposed at the rear of the facility and at background locations. An additional set of three borings (E Series) were completed at selected locations requested by you during the on-site program. Locations of all borings are indicated on the attached Site Plan (Figure 1). Drilling was conducted on December 26, 27, and 28, 1984, by Pioneer Drilling Company with inspection, sample preservation and logging conducted by Mr. David Bramwell, PG, of IT Corporation. Field supervision was performed by Mr. Andrew Diefendorf, CPG, of Calocerinos & Spina.

Soil samples were taken at approximately 3-, 5- and 10-foot depth intervals in all borings with the exception of the E Series at which location samples were obtained at approximately 2-, 4- and 6-foot depth intervals. Samples were either maintained within capped 6-inch or 4-inch California Sampler sleeves, which were then placed in polyethelene bags and stored in teflon-capped glass jars; or the samples were removed from the sampler and placed directly in laboratory-prepared, teflon-capped sample jars. All samples were refrigerated and air freighted to the analytical laboratory at the end of each day of drilling.

Results of Investigations

Attachment A presents the analytical results of all samples processed by California Analytical Laboratory. Of the 26 organic parameters included within the complete USEPA 601 and 602 scans performed, only 6 were identified on the site. Summary results of analyses for these six parameters are presented



as Table 1. Note that of the samples analyzed at 17 locations only 3 (A-1, D-2 and C-3) indicate soil contamination above the allowable limit of 1 mg/kg at a depth of 3 feet. Only two locations (A-1 and C-4) indicated detectable contamination at a sampling depth in excess of three feet. With the exception of locations D-2 and C-3, contaminant concentrations detected were only slightly over the allowable limit.

Based on our review of previous soil removal (see Figure 2) and soil samples taken during this investigation (see Drill Logs, Attachment B), it is our opinion that the majority of contamination was removed during the original remedial efforts. Remnant contamination appears to be concentrated within a shallow (3.5- to 4.5-foot depth) zone of silty organic soil found in a limited area at the rear of the site (see Figures 3 and 4). Our past experience has shown that these fine-grained materials tend to adsorb and retain more of the solvents than the coarser and more porous underlying sand materials.

Portable organic vapor meter (OVM) readings taken during the sampling support the findings that the organic silty sand layer is retaining most of the spilled solvents. While the OVM readings indicate organic vapors dispersed throughout the relatively porous sandy deposts on the site, based on plots of OVM readings (Figures 5 through 7) at the three sample depths, two distinctive sources of contaminant are apparent. Both zones of contamination appear to result from surface runoff away from solvent storage areas in the vicinity of A-1 and A-2, respectively.

Previous excavation of soil from the area of A-2 resulted in removal of any detectable soil contamination in that area, although trace organic vapors are still present. On the other hand, the high concentration of solvents "downsurface" from A-2 at D-2 probably represents entrapment of the solvents within the organic soils immediately beneath the surficially lowest point of surface drainage between A-2 and the concrete drainage swale. The organic layer in this area is of low enough permeability to create a small pocket of trapped or perched water.

Inasmuch as fluid flow in the vadose (unsaturated) zone of the sand deposits beneath the organic layer should be vertical for approximately 80 feet (depth of water table), the spread of contamination at the rear of the site is probably directly related to surface water wash during periods of rain. Infiltrating solvent would be adsorbed by the finer-grained soil layer allowing that layer to act as a potential contaminant source during rainy periods. Note from Figures 3 and 5 that there is a strong correlation between the limits of detectable (greater than 1 ppm) OVM readings and the apparent limits of the organic silty sand layer. The significant quantity of rain prior to and during the period of this investigation may account for leaching of solvents from that layer such that detectable solvents were present at depth in a few of the borings.



It should also be noted that no solvents were detectable at depth in areas where the stratigraphic section of sand is void of any silty organic containing layers. In these areas of relatively clean coarse sand there is very little particle surface upon which the solvent can be retained. Any solvent reaching depth in these areas has already escaped and, if it were not for the limited presence of an organic layer, no solvents would probably be currently detectable on the site.

The key to remediation of this site, therefore, becomes (1) removal of the primary source of contamination, the organic soil layer, and (2) prevention of further migration of any small quantities of solvent contained in deeper sands by elimination of surface water infiltration.

Controlling factors in the practicality of applied methods of remediating this site include (1) the proximity of various structures and (2) the potential low angle of repose of any sands which are excavated. Removal of soils in close proximity to structures may threaten the stability of those structures.

Proposed Additional Remediation

Because some remnant soil contamination is still present at the rear of the site, we recommend the following remedial actions:

- 1. Removal of all heavily contaminated soils outlined in Area "A" of Figure 8 to a depth of 4.5 feet (vertically, if possible) and transport to an approved disposal facility. This represents all contaminated soils within an approximately eight-foot radius of D-2.
- 2. Removal of all soils in Areas "B" and "C" (side slopes of 1:1.5, if possible) to the base of the organic layer (3.5 to 4.5 feet in depth). Note that these areas were delineated by overlay analysis of Figure 3 and 5.
- 3. All soils excavated from Areas "B" and "C" to be loosely spread in a selected area on the east side of the site in a layer not to exceed four inches in thickness and allowed to aerate for a minimum of one week.
- 4. Replacement of aerated soils back in excavation in compacted lifts not to exceed one-foot in thickness and redressing to ground surface with a minimum of four inches of approved gravel base.



In addition, we recommend removal of solvent-stained soils along the embankments of the drainage swale at E-2 to a depth of six inches with disposal at an approved disposal site, and replacement of soils with granular (gravel) materials.

It is assumed that the volumes of soil to be removed as proposed may be the minimum necessary. In order to assess actual soil conditions encountered during remediation, we would utilize a portable OVM to determine if all pockets of significant contamination have been removed and if additional removal is required at time of excavation.

In order to facilitate successful closure of this facility, we request your immediate review and comment on this Proposal. Thank you in advance for your assistance in this matter.

Respectfully submitted,

CALOCERINOS & SPINA

AFD:mts

CC: Mr. R. Phillips (w/enc)

Andrew F. Diefendorf, CPG Manager, Applied Geoscience

TABLE 1
TRENT TUBE
FULLERTON, CALIFORNIA

RESULTS OF ANALYSES

Contaminant Concentration in mg/kg (parts per million)

Method 601 Method 602

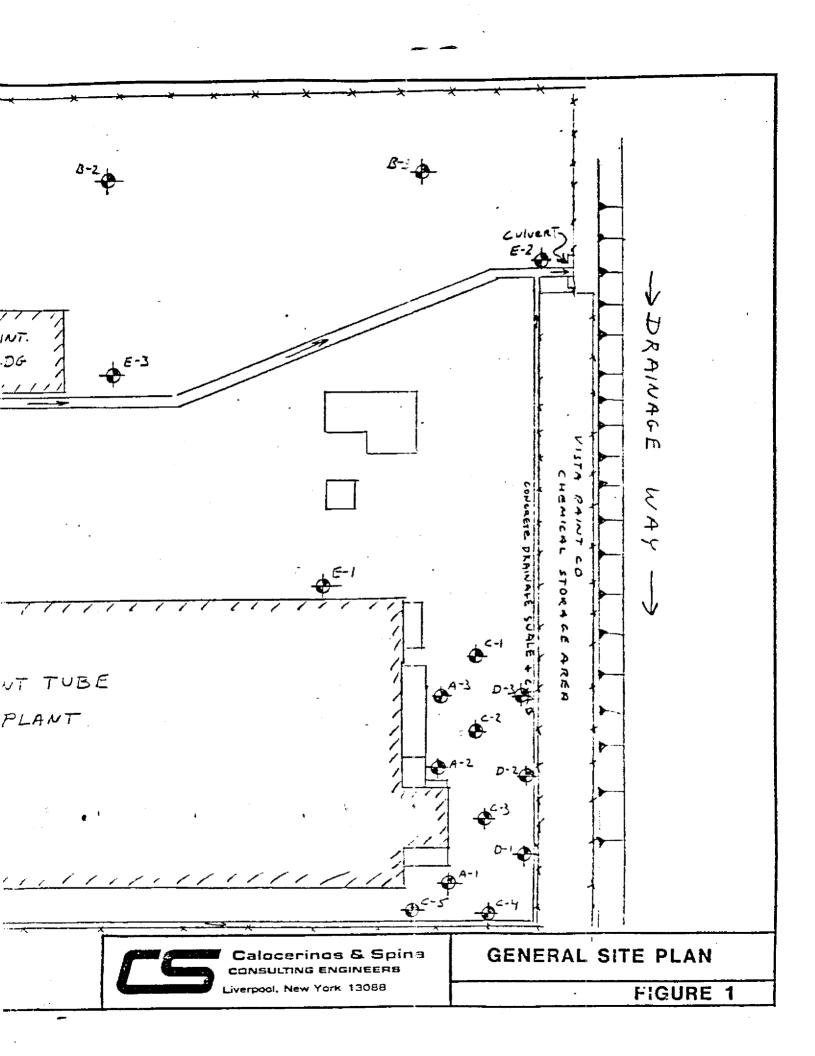
				Method 601		method ouz		
-	Sample <u>Point</u>	Depth (feet)	1,1,1-Tri- chloroethane	Tetrachloro- ethylene	Trichloro- ethylene	Ethyl- Benzene	<u>Xylene</u>	Toluene
-	A-1	3.5 5.0 10.5	1.2 LTD 1.5	1.1 LTD 1.7	LTD LTD LTD	1.7 LTD LTD	2.7 LTD LTD	LTD LTD LTD
 -	A-2	3.5 5.0 10.5	LTD LTD LTD	LTD LTD LTD	LTD LTD LTD	LTD LTD LTD	LTD LTD LTD	LTD LTD LTD
	A-3	3.5 5.0 10.5	LTD LTD · LTD	LTD LTD LTD	LTD LTD LTD	LTD LTD LTD	LTD LTD LTD	LTD LTD LTD
	A-4	3.5 5.0 10.5	LTD LTD LTD	LTD LTD LTD	LTD LTD LTD	LTD LTD LTD	LTD LTD LTD	LTD LTD LTD
_	B-1	3.5 5.0 10.5	LTD LTD LTD	LTD LTD LTD	LTD LTD LTD	LTD LTD LTD	LTD LTD LTD	LTD LTD LTD
	B-2	3.5 510 10.5	LTD LTD LTD	LTD LTD LTD	LTD LTD LTD	LTD LTD LTD	LTD LTD LTD	LTD LTD LTD
-	B-3	3.5 5.0 10.5	LTD LTD LTD	LTD LTD LTD	LTD LTD LTD	LTD LTD LTD	LTD LTD LTD	LTD LTD LTD
-	C-1	3.5 5.0 10.5	L.TD 	LTD 	LTD 	LTD 	LTD 	LTD
rfan	C-2	3.5 5.0 10.5	LTD 	LTD 	LTD 	LTD 	LTD 	LTD
_	C-3	3.5 5.0 10.5	2.2 LTD LTD	5.3 LTD LTD	LTD LTD LTD	LTD LTD LTD	LTD LTD LTD	LTD LTD LTD

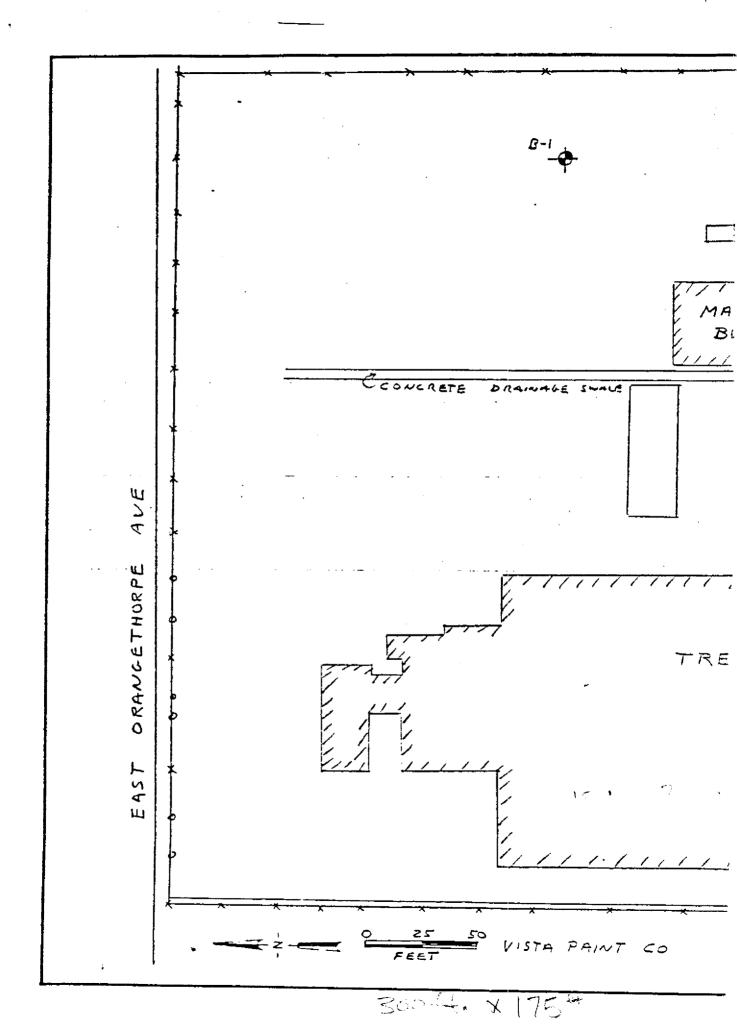
Table 1 (Continued) Page 2

			Contaminant Concentration in mg/kg (parts per million)					
				Method 602				
	Sample Point	Depth (feet)	1,1,1-Tri- Chloroethane	Tetrachloro- ethylene	Trichloro- ethylene	Ethyl- Benzene	<u>Xylene</u>	<u>Toluene</u>
•	C-4	3.5 5.0 10.5	LTD LTD LTD	LTD LTD LTD	LTD LTD LTD	LTD LTD LTD	LTD LTD LTD	LTD LTD 1.1
•	D-1	3.5 5.0 10.5	LTD 	LTD 	LTD 	LTD 	LTD 	LTD
•	D-2	3.5 5.0 10.5	780 LTD LTD	21 LTD LTD	70 LTD LTD	LTD LTD LTD	95 LTD LTD	LTD LTD LTD
-	D-3	3.5 5.0 10.5	LTD LTD LTD	LTD LTD LTD	LTD LTD LTD	LTD LTD LTD	LTD LTD LTD	LTD LTD LTD
	E-1	3.5 4.0 6.0	LTD 	LTD 	LTD 	LTD 	LTD 	LTD
-	E-2	2.0 4.0 6.0	LTD 	LTD 	LTD 	LTD 	LTD 	LTD
-	E-3	2.0 4.0 6.0	LTD 	LTD 	LTD 	LTD 	LTD 	LTD

NOTES:

LTD = Less Than Detectable limit of 0.5 mg/kg.
 -- = Sample Not Analyzed

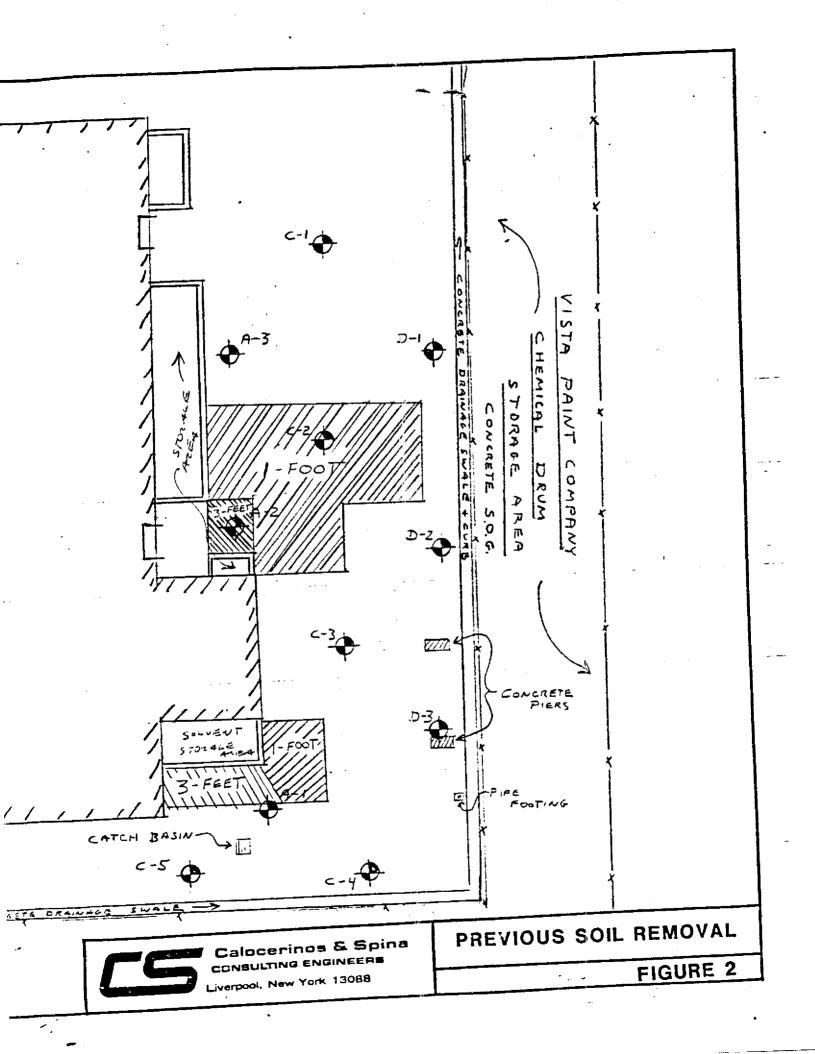




TRENT TUBE

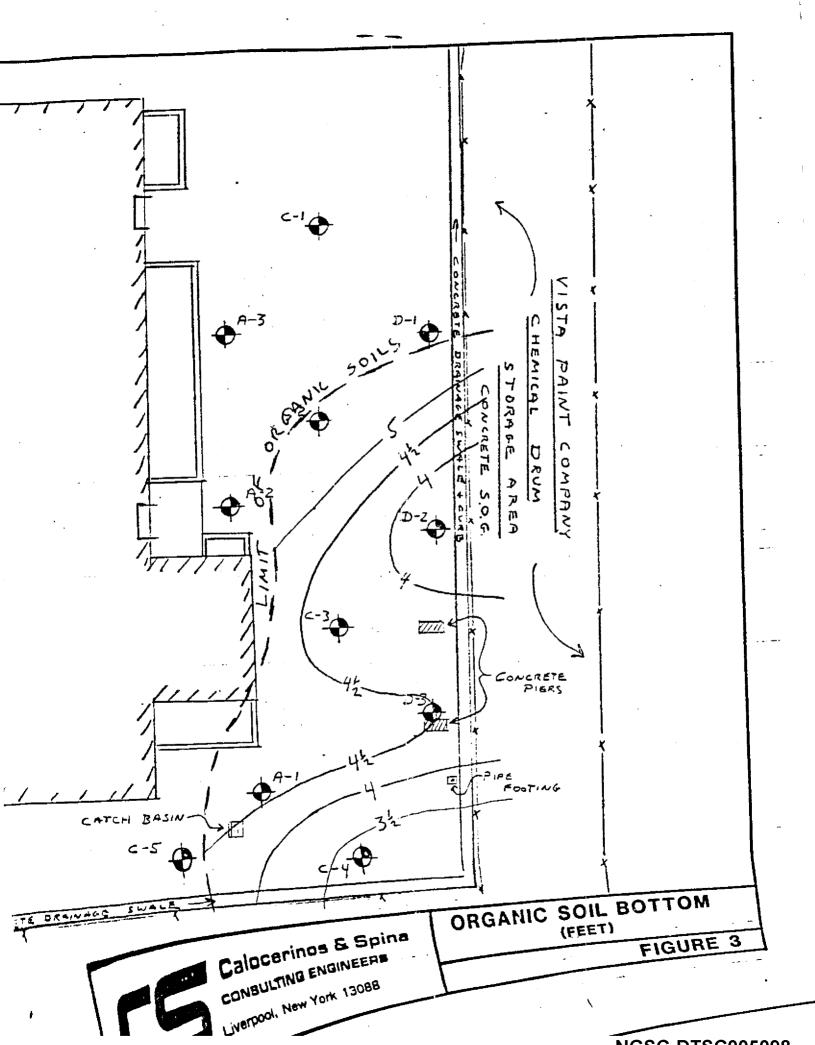
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FEET

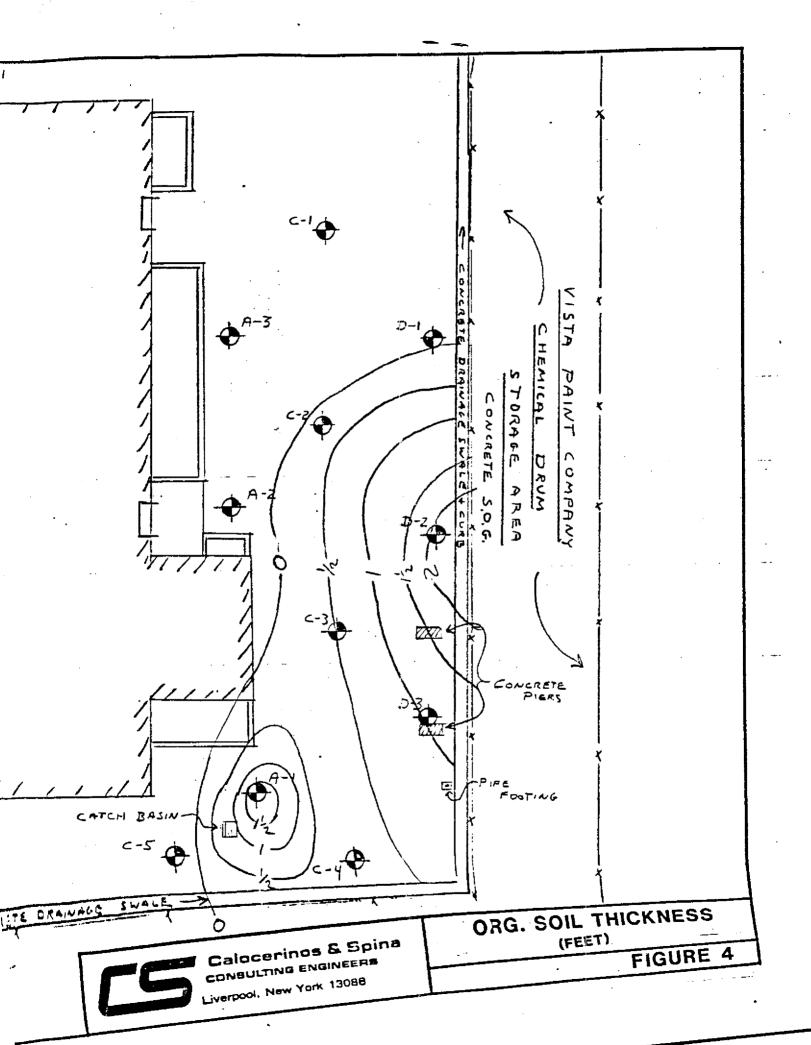


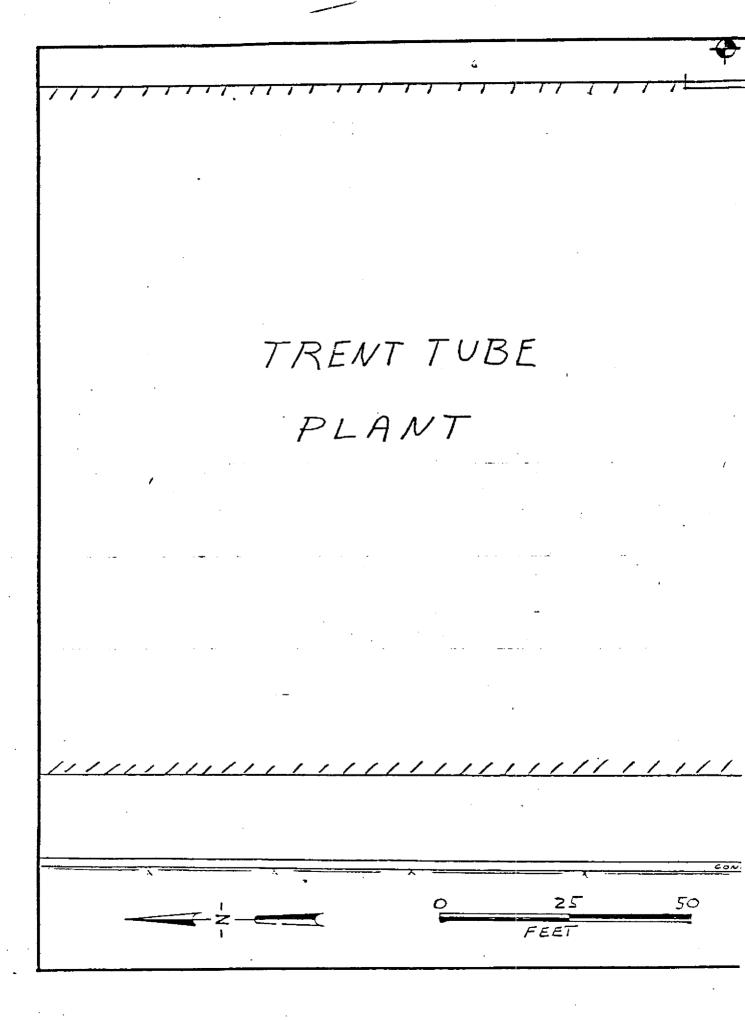
TRENT TUBE PLANT

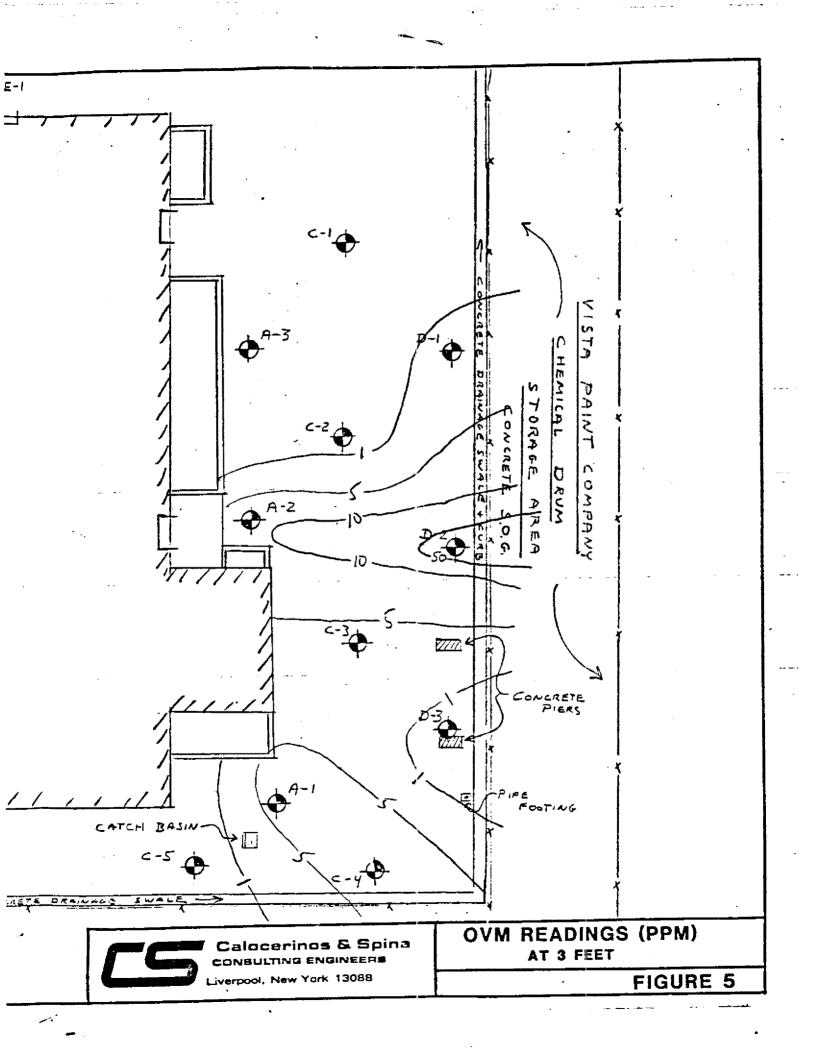
CONCI CONCI FEET



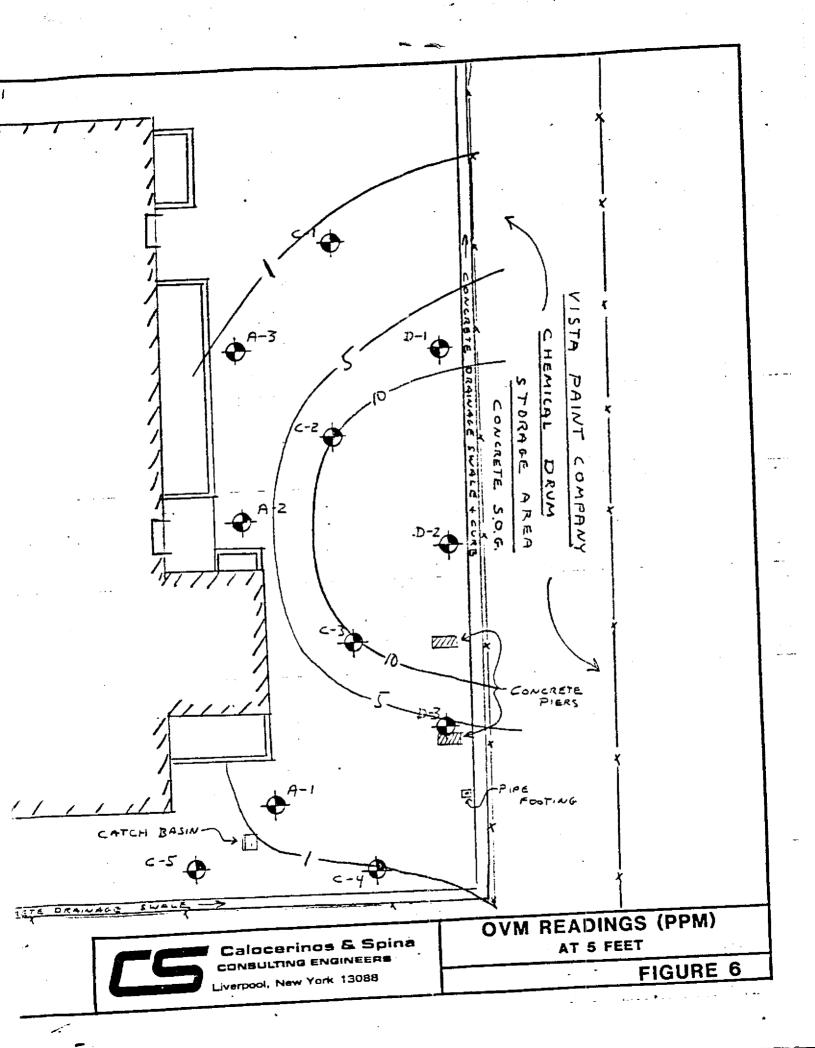
TRENT TUBE PLANT

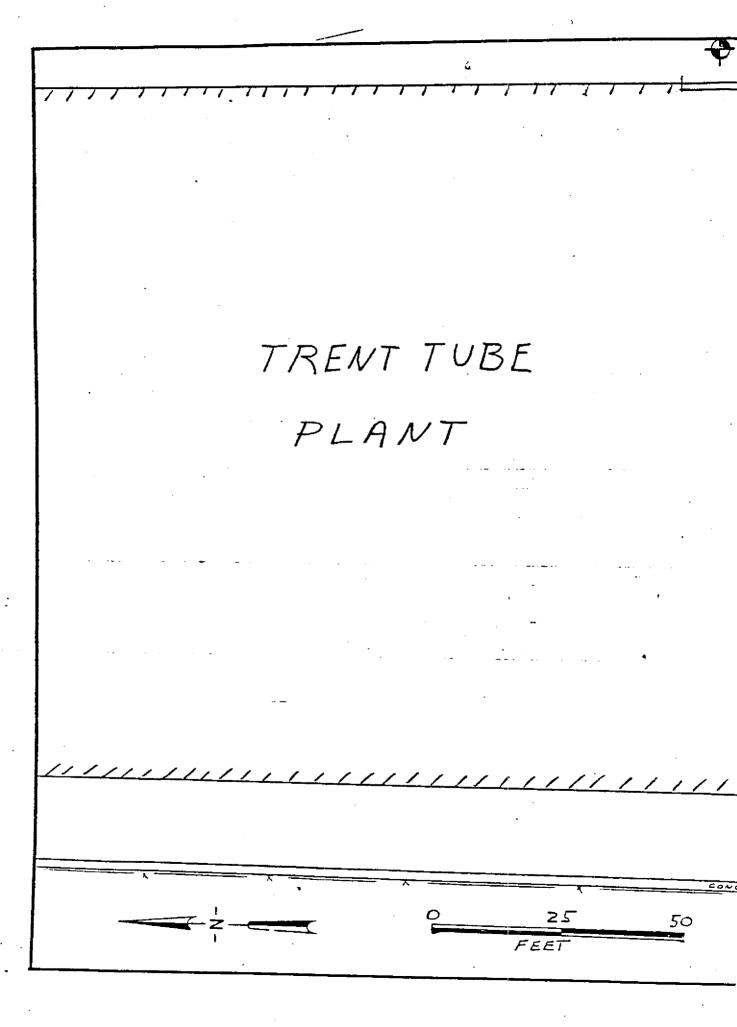


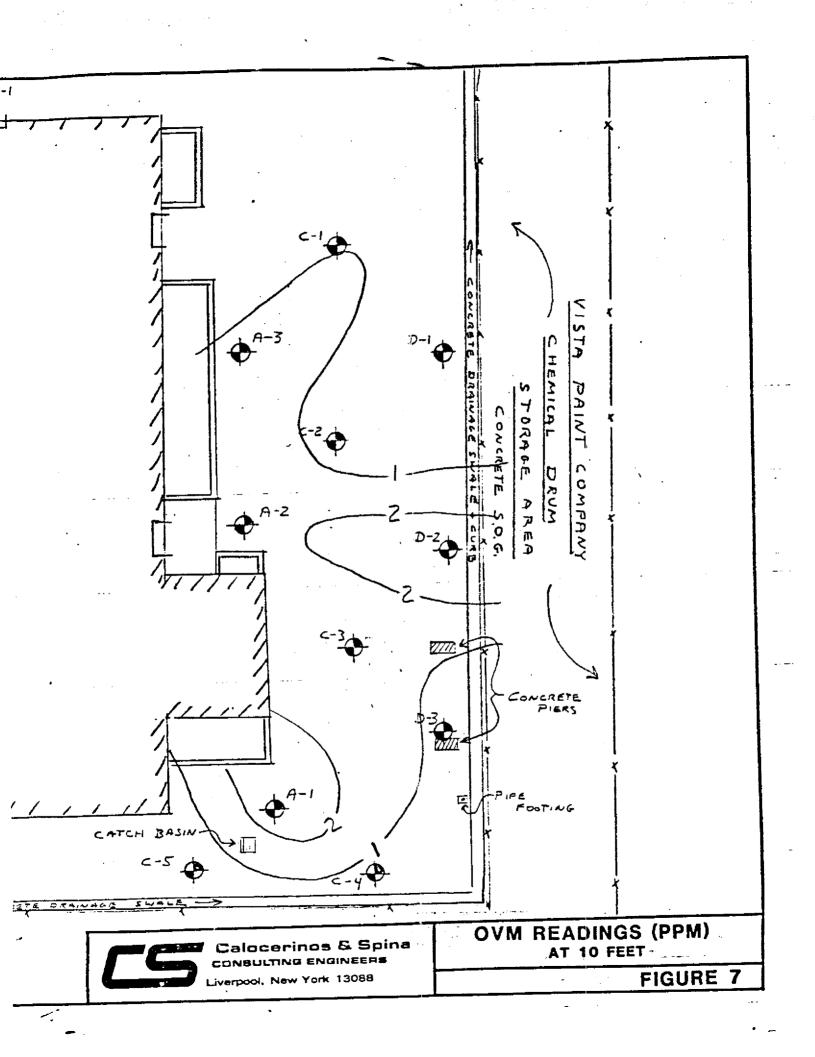


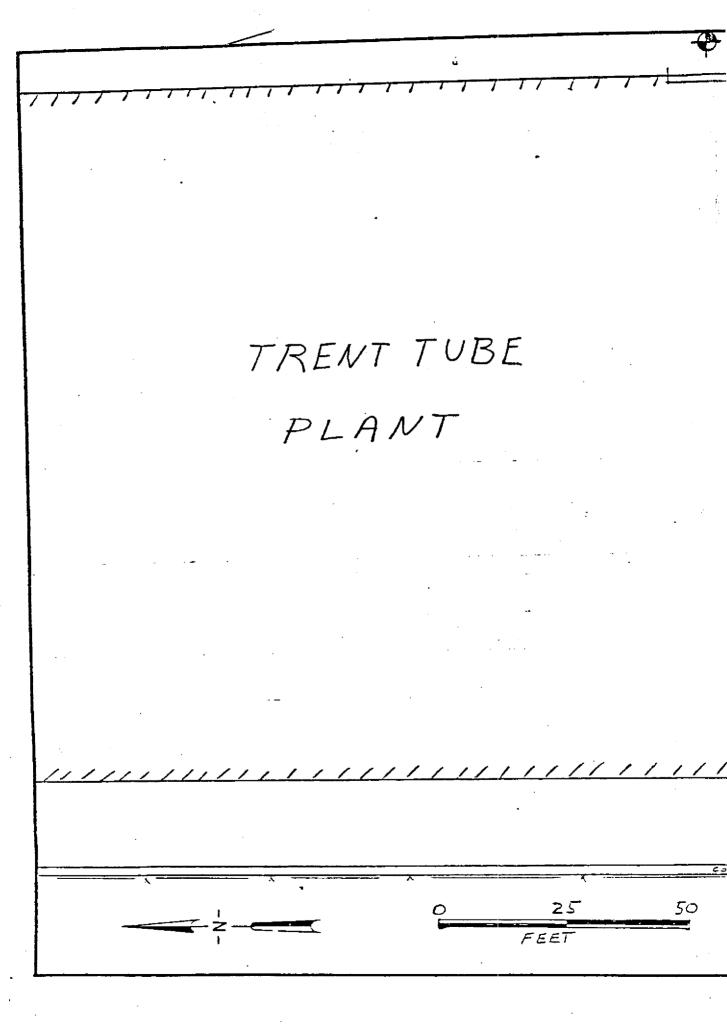


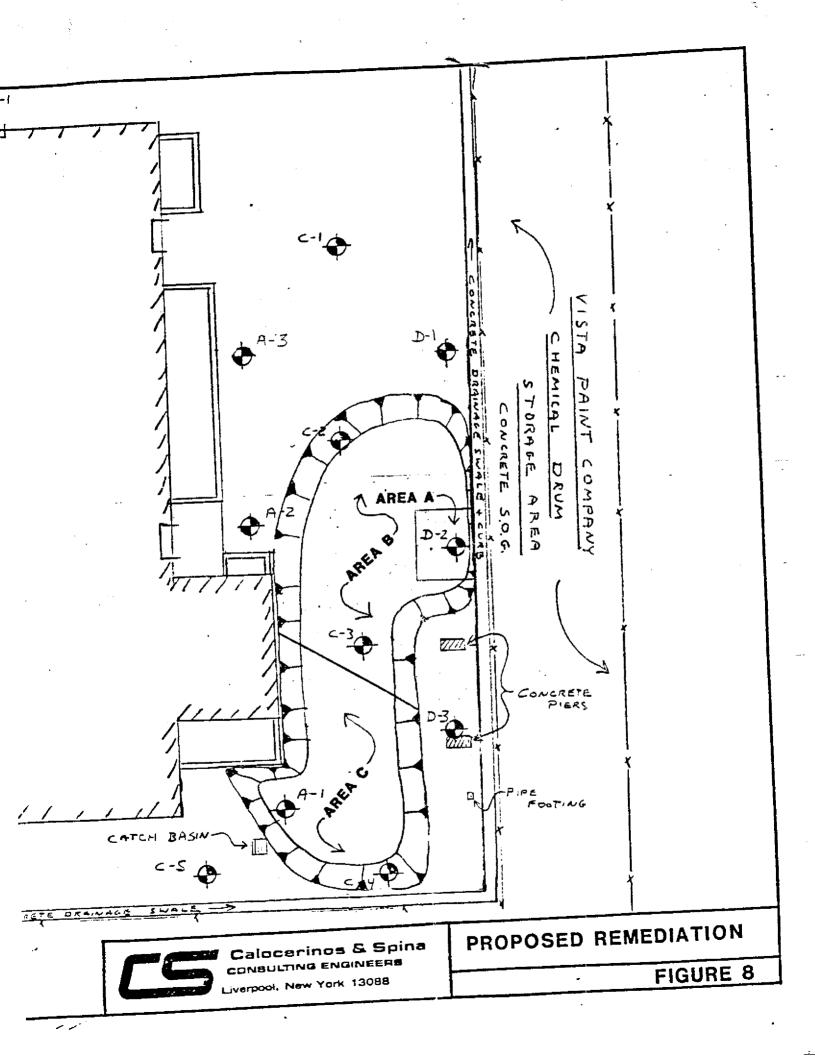
TRENT TUBE PLANT











APPENDIX H

CORRESPONDENCE REGARDING
AIR QUALITY BOARD EXCAVATION PERMIT



Calocerinos & Spina consulting engineers

1020 Seventh North Street, Liverpool, NY 13088 • (315) 457-6711

January 28, 1985

Mr. Fred Lettice
Supervising Engineer
South Coast Air Quality
Management District
9150 Flair Drive
Elmonte, California 91731

Re: Site Remediation Plan
Trent Tube Plant
2100 East Orangethorpe Ave.
Fullerton, California
CAD 008325110

File: 469.003

Dear Mr. Lettice:

In response to our telephone conversation with Mr. Robert Pease of your office on January 28, 1985, we are submitting herewith for your immediate review a copy of the Site Remediation Plan which we have filed with the California Department of Health Services. We understand that an excavation permit from the Air Quality Management District may be necessary to accomplish this remediation.

The inactive Trent Tube Facility (stainless steel manufacturing) is located within a heavily industrialized area along East Orangethorpe Avenue in Fullerton. The small (30X100 foot) area adjacent to the rear of the building to be remediated is surrounded by Vista's paint manufacturing facility and Vista's chemical storage area.

The remedial plan calls for removal of approximately three (3) truckloads of soil to a hazardous waste landfill. Discussions with the Department of Health Services indicate that the remaining soils may be removed to a Class II-1 Landfill or spread in a thin layer and allowed to aerate for a week prior to placement back in the excavation. A portable OVH would be utilized during excavation to determine if any additional materials should be also sent to a hazardous facility, as well as to monitor air quality during excavation.

Please note from Figures 5 through 7 of the Report that the OVM readings of soil samples were generally within the same order of magnitude (1-10 ppm) as the background (neighborhood) OVM readings of the air taken during our investigations. Based on the small area involved and the generally low level of organic contamination of soils, we do not believe that an air quality problem will present itself during our proposed remedial efforts.



Mr. Fred Lettice January 28, 1985 Page 2

Trent Tube desires to complete closure of their facility prior to February 15, 1985, and requests your assistance in reaching that goal. We will be contacting you during the middle of this week to determine if the District will require a permit. Meanwhile, should you have any questions regarding this submittal, please feel free to contact the undersigned.

Very truly yours,

CALOCERINOS & SPINA

AFD:mts

Enclosure

CC: Mr. R. Phillips

Andrew F. Diefendorf, CPG Manager, Applied Geoscience



Calocerinos & Spina

1020 Seventh North Street, Liverpool, NY 13088 • (315) 457-6711

January 18, 1985

Mr. Roy Thielking
Project Manager
Facility Permitting Unit
Southern California Section
Toxic Substances Control Division
Department of Health Services
197 Broadway, Room 7128
Los Angeles, California 90052

Re: Site Remediation Plan Trent Tube Plant Fullerton, California

CAD 008325110

File: 469.003

Dear Mr. Thielking:

We have completed our site assessment for the above-referenced Project and present herein the results of that assessment and our proposed plan for remediation of the site.

Site Sampling

A total of 14 borings were completed as originally proposed at the rear of the facility and at background locations. An additional set of three borings (E Series) were completed at selected locations requested by you during the on-site program. Locations of all borings are indicated on the attached Site Plan (Figure 1). Drilling was conducted on December 26, 27, and 28, 1984, by Pioneer Drilling Company with inspection, sample preservation and logging conducted by Mr. David Bramwell, PG, of IT Corporation. Field supervision was performed by Mr. Andrew Diefendorf, CPG, of Calocerinos & Spina.

Soil samples were taken at approximately 3-, 5- and 10-foot depth intervals in all borings with the exception of the E Series at which location samples were obtained at approximately 2-, 4- and 6-foot depth intervals. Samples were either maintained within capped 6-inch or 4-inch California Sampler sleeves, which were then placed in polyethelene bags and stored in tefloncapped glass jars; or the samples were removed from the sampler and placed directly in laboratory-prepared, teflon-capped sample jars. All samples were refrigerated and air freighted to the analytical laboratory at the end of each day of drilling.

Results of Investigations

Attachment A presents the analytical results of all samples processed by California Analytical Laboratory. Of the 26 organic parameters included within the complete USEPA 501 and 602 scans performed, only 6 were identified on the site. Summary results of analyses for these six parameters are presented



as Table 1. Note that of the samples analyzed at 17 locations only 3 (A-1, D-2 and C-3) indicate soil contamination above the allowable limit of 1 mg/kg at a depth of 3 feet. Only two locations (A-1 and C-4) indicated detectable contamination at a sampling depth in excess of three feet. With the exception of locations D-2 and C-3, contaminant concentrations detected were only slightly over the allowable limit.

Based on our review of previous soil removal (see Figure 2) and soil samples taken during this investigation (see Drill Logs, Attachment B), it is our opinion that the majority of contamination was removed during the original remedial efforts. Remnant contamination appears to be concentrated within a shallow (3.5- to 4.5-foot depth) zone of silty organic soil found in a limited area at the rear of the site (see Figures 3 and 4). Our past experience has shown that these fine-grained materials tend to adsorb and retain more of the solvents than the coarser and more porous underlying sand materials.

Portable organic vapor meter (OVM) readings taken during the sampling support the findings that the organic silty sand layer is retaining most of the spilled solvents. While the OVM readings indicate organic vapors dispersed throughout the relatively porous sandy deposts on the site, based on plots of OVM readings (Figures 5 through 7) at the three sample depths, two distinctive sources of contaminant are apparent. Both zones of contamination appear to result from surface runoff away from solvent storage areas in the vicinity of A-1 and A-2, respectively.

Previous excavation of soil from the area of A-2 resulted in removal of any detectable soil contamination in that area, although trace organic vapors are still present. On the other hand, the high concentration of solvents "downsurface" from A-2 at D-2 probably represents entrapment of the solvents within the organic soils immediately beneath the surficially lowest point of surface drainage between A-2 and the concrete drainage swale. The organic layer in this area is of low enough permeability to create a small pocket of trapped or perched water.

Inasmuch as fluid flow in the vadose (unsaturated) zone of the sand deposits beneath the organic layer should be vertical for approximately 80 feet (depth of water table), the spread of contamination at the rear of the site is probably directly related to surface water wash during periods of rain. Infiltrating solvent would be adsorbed by the finer-grained soil layer allowing that layer to act as a potential contaminant source during rainy periods. Note from Figures 3 and 5 that there is a strong correlation between the limits of detectable (greater than 1 ppm) OVM readings and the apparent limits of the organic silty sand layer. The significant quantity of rain prior to and during the period of this investigation may account for leaching of solvents from that layer such that detectable solvents were present at depth in a few of the borings.



as Table 1. Note that of the samples analyzed at 17 locations only 3 (A-1, D-2 and C-3) indicate soil contamination above the allowable limit of 1 mg/kg at a depth of 3 feet. Only two locations (A-1 and C-4) indicated detectable contamination at a sampling depth in excess of three feet. With the exception of locations D-2 and C-3, contaminant concentrations detected were only slightly over the allowable limit.

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Portable organic vapor meter (OVM) readings taken during the sampling support the findings that the organic silty sand layer is retaining most of the spilled solvents. While the OVM readings indicate organic vapors dispersed throughout the relatively porous sandy deposts on the site, based on plots of OVM readings (Figures 5 through 7) at the three sample depths, two distinctive sources of contaminant are apparent. Both zones of contamination appear to result from surface runoff away from solvent storage areas in the vicinity of A-1 and A-2, respectively.

Previous excavation of soil from the area of A-2 resulted in removal of any detectable soil contamination in that area, although trace organic vapors are still present. On the other hand, the high concentration of solvents "downsurface" from A-2 at D-2 probably represents entrapment of the solvents within the organic soils immediately beneath the surficially lowest point of surface drainage between A-2 and the concrete drainage swale. The organic layer in this area is of low enough permeability to create a small pocket of trapped or perched water.

Inasmuch as fluid flow in the vadose (unsaturated) zone of the sand deposits beneath the organic layer should be vertical for approximately 80 feet (depth of water table), the spread of contamination at the rear of the site is probably directly related to surface water wash during periods of rain. Infiltrating solvent would be adsorbed by the finer-grained soil layer allowing that layer to act as a potential contaminant source during rainy periods. Note from Figures 3 and 5 that there is a strong correlation between the limits of detectable (greater than 1 ppm) OVM readings and the apparent limits of the organic silty sand layer. The significant quantity of rain prior to and during the period of this investigation may account for leaching of solvents from that layer such that detectable solvents were present at depth in a few of the borings.



It should also be noted that no solvents were detectable at depth in areas where the stratigraphic section of sand is void of any silty organic containing layers. In these areas of relatively clean coarse sand there is very little particle surface upon which the solvent can be retained. Any solvent reaching depth in these areas has already escaped and, if it were not for the limited presence of an organic layer, no solvents would probably be currently detectable on the site.

The key to remediation of this site, therefore, becomes (1) removal of the primary source of contamination, the organic soil layer, and (2) prevention of further migration of any small quantities of solvent contained in deeper sands by elimination of surface water infiltration.

Controlling factors in the practicality of applied methods of remediating this site include (1) the proximity of various structures and (2) the potential low angle of repose of any sands which are excavated. Removal of soils in close proximity to structures may threaten the stability of those structures.

Proposed Additional Remediation

Because some remnant soil contamination is still present at the rear of the site, we recommend the following remedial actions:

- Removal of all heavily contaminated soils outlined in Area "A" of Figure 8 to a depth of 4.5 feet (vertically, if possible) and transport to an approved disposal facility. This represents all contaminated soils within an approximately eight-foot radius of D-2.
- 2. Removal of all soils in Areas "B" and "C" (side slopes of 1:1.5, if possible) to the base of the organic layer (3.5 to 4.5 feet in depth). Note that these areas were delineated by overlay analysis of Figure 3 and 5.
- 3. All soils excavated from Areas "B" and "C" to be loosely spread in a selected area on the east side of the site in a layer not to exceed four inches in thickness and allowed to aerate for a minimum of one week.
- 4. Replacement of aerated soils back in excavation in compacted lifts not to exceed one-foot in thickness and redressing to ground surface with a minimum of four inches of approved gravel base.



In addition, we recommend removal of solvent-stained soils along the embankments of the drainage swale at E-2 to a depth of six inches with disposal at an approved disposal site, and replacement of soils with granular (gravel) materials.

It is assumed that the volumes of soil to be removed as proposed may be the minimum necessary. In order to assess actual soil conditions encountered during remediation, we would utilize a portable OVM to determine if all pockets of significant contamination have been removed and if additional removal is required at time of excavation.

In order to facilitate successful closure of this facility, we request your immediate review and comment on this Proposal. Thank you in advance for your assistance in this matter.

Respectfully submitted,

CALOCERINOS & SPINA

Andrew F. Diefendorf, CPG

Manager, Applied Geoscience

AFD:mts

CC: Mr. R. Phillips (w/enc)

TABLE 1
TRENT TUBE
FULLERTON, CALIFORNIA

RESULTS OF ANALYSES

•			Contami	nant Concentra	tion in mg/kg	(parts pe	r millio ethod <u>60</u>	<u>n)</u>
	Sample Point	Depth (feet)	1,1,1-Tri- chloroethane	Method 601 Tetrachloro- ethylene	Trichloro- ethylene	Ethyl- Benzene	Xylene	Toluene
-	A-1	3.5 5.0 10.5	1.2 LTD 1.5	1.1 LTD 1.7	LTD LTD LTD	1.7 LTD LTD	2.7 LTD LTD	LTD LTD LTD
-	A-2	3.5 5.0 10.5	LTD LTD LTD	LTD LTD LTD	LTD LTD LTD	LTD LTD LTD	LTD LTD LTD	LTD LTD LTD
-	A-3	3.5 5.0 10.5	LTD LTD ' LTD	LTD LTD LTD	LTD LTD LTD	LTD LTD LTD	LTD LTD LTD	LTD LTD LTD
	A-4	3.5 5.0 10.5	LTD LTD LTD	LTD LTD LTD	LTD LTD LTD	LTD LTD LTD	LTD LTD LTD	LTD LTD LTD
	B-1	3.5 5.0 10.5	LTD LTD LTD	LTD LTD LTD	LTD LTD LTD	LTD LTD LTD	LTD LTD LTD	LTD LTD LTD
_	B-2	3.5 5.0 10.5	LTD LTD LTD	LTD LTD LTD	LTD LTD LTD	LTD LTD LTD	LTD LTD LTD	LTD LTD LTD
-	B-3	3.5 5.0 10.5	LTD LTD LTD	LTD LTD LTD	LTD LTD LTD	LTD LTD LTD	LTD LTD LTD	LTD LTD LTD
_	C-1	3.5 5.0 10.5	LTD 	LTD 	LTD 	LTD 	LTD 	LTD
	C-2	3.5 5.0 10.5	LTD	LTD 	LTD 	LTD 	£TD 	LTD
renda	C-3	3.5 5.0 10.5	2.2 LTD LTD	5.3 LTD LTD	LTD LTD LTD	L.TD L.TD L.TD	LTD LTD LTD	LTD LTD LTD

Table 1 (Continued) Page 2

			Contaminant Concentration in mg/kg			(parts per million)		
				Method 601		Method ouz		
_	Sample Point	Depth (feet)	1,1,1-Tri- Chloroethane	Tetrachloro- ethylene	Trichloro- ethylene	Ethyl- Benzene	Xylene	Toluene
-	C-4	3.5 5.0 10.5	LTD LTD LTD	LTD LTD LTD	LTD LTD LTD	LTD LTD LTD	LTD LTD LTD	LTD LTD 1.1
	D-1	3.5 5.0 10.5	LTD 	LTD 	LTD 	LTD 	LTD 	LTD
···	D-2	3.5 5.0 10.5	780 LTD LTD	21 LTD LTD	70 LTD LTD	LTD LTD LTD	95 LTD LTD	LTD LTD LTD
arit.	D-3	3.5 5.0 10.5	LTD LTD LTD	LTD LTD LTD	LTD LTD LTD	LTD LTD LTD	LTD LTD LTD	LTD LTD LTD
	E-1	3.5 4.0 6.0	LTD 	LTD 	LTD 	LTD 	LTD 	LTD
enter '	E-2	2.0 4.0 6.0	LTD 	LTD 	LTD 	LTD 	LTD 	LTD
	E-3	2.0 4.0 6.0	LTD 	LTD	LTD 	LTD 	LTD 	LTD

NOTES:

LTD = Less Than Detectable limit of 0.5 mg/kg.
 -- = Sample Not Analyzed



Calocerinos & Spina consulting Engineers

1020 Seventh North Street, Liverpool, NY 13088 • (315) 457-6711

January 28, 1985

Mr. Roy Thielking
Project Manager
Facility Permitting Unit
Southern California Section
Toxic Substances Control Division
Department of Health Services
197 Broadway, Room 7128
Los Angeles, California 90052

Re: Site Remediation Plan
Trent Tube Plant

Fullerton, California

CAD 008325110

File: 469.003

Dear Mr. Thielking:

In response to our phone conversation of Friday, January 25, 1985, we have discussed the above-referenced Remediation Plan with the South Coast Air Quality Management District. We are providing that office with a copy of the Remediation Plan for review to determine if an excavation permit will be necessary.

Dependent upon the needs of the District, we will either (1) spread for aeration those soils not requiring disposal at a hazardous waste facility or (2) transport those low level contaminated soils to a Class II-1 facility.

Inasmuch as your Department seems to be in general agreement with our Remedial Plan, we are in need of written approval or contingent approval of that Plan. Please let us know if you are in need of any further submittals by us at this time.

Very truly yours,

CALOCERINOS & SPINA

Andrew F. Diefendorf, CPG Manager, Applied Geoscience

AFD:mts

CC: Mr. R. Phillips



Calocerinos & Spina consulting Engineers

1020 Seventh North Street, Liverpool, NY 13088 - (315) 457-6711

February 1, 1985

Mr. Roy Thielking
Project Manager
Facility Permitting Unit
Southern California Section
Toxic Substances Control Division
Department of Health Services
197 Broadway, Room 7128
Los Angeles, California 90052

Re: Site Remediation Plan

Trent Tube Plant Fullerton, California

CAD 008325110

File: 469.003

Dear Mr. Thielking:

Please find enclosed for your review one (1) copy of our Excavation Plan for the SCAQMD Permit Application for closure of the above-referenced facility.

As descussed, we have scheduled a meeting with you and a representative of your office, the Owner, the Contractor and C&S at the offices of the SCAQMD (9150 Flair Drive, Elmonte, California) on Thursday, February 7, 1985, at 2:30 p.m.

It is our desire to finalize, at that meeting, any necessary changes to the Excavation Permit in order that we may obtain that Permit and receive Department of Health Services approval of the Closure Plan by the end of the week and be able to initiate excavation on Monday, February 11, 1985.

We look forward to meeting with you at that time.

Very truly yours,

CALOCERINOS & SPINA

AFD:mts

Andrew F. Diefendorf, CPG Manager, Applied Geoscience

Enclosure

CC: Mr. R. Phillips



Calocerinos & Spina CONSULTING ENGINEERS

1020 Seventh North Street, Liverpool, NY 13088 • (315) 457-6711

February 1, 1985

Mr. Fred Lettice
Supervising Engineer
South Coast Air Quality
Management District
9150 Flair Drive
Elmonte, California 91731

Re: Site Remediation Plan
Trent Tube Plant
2100 East Orangethorpe Ave.
Fullerton, California

CAD 008325110

File: 469.003

Dear Mr. Lettice:

Please find attached for your review one (1) copy of the Excavation Permit Narrative for the above-referenced Project. Copies of the signed Application are being forwarded by the Owner and should be delivered to your offices by Tuesday, February 5, 1985.

As discussed wit Mr. Pease of SCAQMD, we have scheduled a meeting at your offices for Thursday, February 7, 1985, at 2:30 p.m. to discuss the Permit Application and the Site Closure Plan with representative of your agency, Mr. Thielking of the Department of Health Services, the Owner, and the Excavation Contractor. It is our desire to have all approvals and Permits in hand by the end of the week in order to initiate excavation on Monday, February 11, 1985.

Should you have any quesitons or require further information for the Permit narrative, please contact the undersigned. Your assistance in this matter is greatly appreciated.

Very truly yours,

CALOCERINOS & SPINA

AFD:mts

Andrew F. Diefendorf, CPG Manager, Applied Geoscience

Enclosure

CC: Mr. R. Phillips

SCAOMD EXCAVATION PERMIT APPLICATION PLAN NARRATIVE

<u>AND</u>

CDHS SITE CLOSURE PLAN AMENDMENT

Submitted to:

South Coast Air Quality Monitoring District

and

California Department of Health Services

For:

Trent Tube Plant
2100 East Orangethorpe Avenue
Fullerton, California

CAD 008325110

By:

CALOCERINOS & SPINA CONSULTING ENGINEERS 1020 Seventh North Street Liverpool, New York 13088

February 1985

AOMD EXCAVATION PLAN NARRATIVE

General

This narrative is submitted to satisfy the combined requirements of the California Department of Health Services (CDHS) for facility closure and the excavation permit requirements of the South Coast Air Quality Monitoring District (SCAQMD). The original Closure Plan (PLAN) was submitted to the CDHS and SCAQMD on January 18 and 28, 1985, respectively. That PLAN should be referenced as the primary Closure and Excavation Plan. For purposes of brevity, this narrative should be reviewed as an Amendment to the PLAN.

Based on discussions with Mr. Thielking of CDHS and Mr. Pease of SCAQMD, we propose the methods of soil excavation, removal, treatment, monitoring and management as described below.

Soil Remediation and Quantities

Approximately 20 to 40 cubic yards (cy) of moderately 1,1,1,Trichloro-ethane (TCE) contaminated (2 to 780 ppm) soil in the vicinity of Boring D-2 (Figure 1A) will be removed from the site as presented in the original PLAN (Area 1 of Figure 8). This soil will be transported under manifest along with oil-stained surface soils in the vicinity of Boring E-2 to a Class-1 facility for disposal. Note that no vinyl chloride was used at the facility and none was detected in the organic scans of samples obtained.

Approximately 450 cy of lightly TCE contaminated (less than 2 ppm) soil as outlined in the original PLAN as Areas 2 and 3 will be excavated and spread in a four-inch layer in an area on the east side of the property as outlined in Figure 1A. This soil will be allowed to aerate for a period upto one week prior to placement back in the excavated areas.

Monitoring During Excavation

During excavation a portable organic vapor meter (OVM) will be utilized to determine if additional soils will require transport to a Class 1 facility. In addition, background air and soil readings will be obtained with the OVM to determine if the work is affecting the air quality in the vicinity of the excavation. Should levels of volatiles increase above ambient air quality, then excavation will cease until levels have dropped.

Organic Vapor Sampling

Approximately 30 soil samples in the vicinity of the 3,000 s.f. area to be excavated has been tested both analytically (USEPA 601 and 602 scans) as well as by OVM (see Original Plan). Based on these results it is estimated that the volume of soils to be excavated and trucked from the site contain approximately a maximum 0.5 gallons of TCE.

It should be noted that no vapor problems were reported during previous efforts which removed the majority of contaminated soils from the facility during the summer of 1984. Recent OVM readings at the location to be excavated indicated no detectable elevation in the ambient air levels derived from the soils on the site.

Excavation and Transportation

Excavation and loading into trucks for off-site disposal will be accomplished utilizing a front-end and skip loader. Excavation will not be conducted on days when the SCAQMD forecasts 1st, 2nd or 3rd stage episodes for the area where the excavation will occur. Excavation will not be conducted on days when the wind velocity is greater than 15 mph average or 25 mph gusts.

Trucks will be provided with plastic box liners to encapsulate the soil. An impermeable tie-down tarpaulin will also be required for each truck leaving the site. It is estimated that only three truckloads will be required to transport materials from the site.

Monitoring and Control of Soil Spreading

During spreading of soils to be aerated, the OVM will be utilized to monitor any changes in ambient air quality. Based on previous soils analyses the estimated maximum possible volume of TCE contained within the 450 cy of soils to be aerated is approximately 0.2 gallons. No changes in vapor readings should, therefore, be detectable at the aeration area. Should elevated levels be determined, the rate of transport and spreading can be slowed. Inasmuch as the materials to be excavated and spread generally consist of moist medium to coarse sands, dust problems also are not anticipated. However, should dust or windblown particulates present a problem during spreading, a light application of water utilizing spray hoses will be accomplished. This method of dust control will be minimized to a misting operation in order to prevent leaching of TCE from the sand.

Agreement to Cease Operation

The owner agrees that excavation and spreading operations will be immediately ceased, if he has been informed by the Executive Officer of SCAQMD that a public nuisance has occurred.

Contingent Plans

Should the aeration of the soils prove to be the sole source of public nuisance, it is proposed that those soils to be aerated will be removed from the site to a Class II-1 facility in the same manner as the soils removed to the Class I facility.

Respectfully submitted,
TRENT TUBE DIVISION

Robert Phillips Assistant Vice President Finance and Administration

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT 9150 Flair Drive El Monte, CA 91731

APPLICATION FOR PERMIT TO CONSTRUCT AND PERMIT TO OPERATE AND EXCAVATE FOR FEE INFORMATION AND SMALL BUSINESS EXEMPTION SEE REVERSE SIDE

	SCAQMD USE
PERMIT TO BE ISSUED TO. Trent Tube Division, Crucible Material Corporation	
BUSINESS LICENSE NAME OF ORGANIZATION THAT IS TO RECEIVE PERMIT	SEC TS ID NUMBER
Colt Industries, Inc.	
AME (OR NAMES) OF OWNER OR PRINCIPAL PARTNERS DOING BUSINESS AS (OBA) ABOVE ORGANIZATION	2 8.
A MAILING ADDRESS 2188 So. Church Street, East Troy, Wisconsin	53120
CITY OR COMMUNITY STATE	ZIP CODE
NUMBER STREET - LYCAVATION AT 3	Chara College Plyd
2100 East Orangethorpe Avenue, Fullerton, Calif. 92031	State College Blvd.
IUMBER STREET CITY OR COMMUNITY ZIP	
A CONTAGE PERSON (INITIALS & NAME.)	REA G 110-11.
Robert Phillips 1414, 042-7321 EQUIPMENT. APPLICATION IS HERBY MADE FOR PERMIT TO OPERATE THE FOLLOWING EQUIPMENT.	
Excavation Permit per Rule 1150	NER THAT OPERATED THIS EQUIPMENT, AND STATE PREVIO
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NAME 7 PERMIT APPLICATION FOR EQUIPMENT REINSTATE NON—PAYMENT P. O 8 TYPE OF ORGANIZATION	
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South Coast AIR QUALITY MANAGEMENT DISTRICT

\$150 FLAIR DRIVE, EL MONTE, CA 91731 (818) 572-6200

February 5, 1985

Trent Tube Company 2100 East Orangethorpe Avenue Fullerton, California

Att: Robert Phillips

Assistant Vice President

Gentlemen:

RULE 1150 EXCAVATION PERMIT

Reference is made to your application for a Rule 1150 excavation permit for the excavation of 40 yd^3 and the aeration of 500 yd^3 from the southwest area of the Trent Tube Plant property located in Fullerton, California.

Please be advised that this excavation permit is granted under Rule 1150 of the Rules and Regulations of the South Coast Air Quality Management District and is subject to the following conditions:

- This excavation permit is valid until March 1, 1985. An extension may be granted upon request.
- This District shall be notified in writing when the excavation begins and when it is terminated.
- Areas A, B, and C are the locations as identified in your Rule 1150 application.
- 4. Only material excavated from Areas B and C may be aerated.
- 5. All excavated material that is aerated shall be watered until the surface is moist and then maintained in a moist condition to prevent dusting.
- Any spreading of material to neutralize the soil from areas B and C shall be done in a manner to minimize emissions.
- 7. All material that is excavated from area A must be immediately placed in trucks or trailers which will be used to transport the material.
- During excavation, if a considerable number of complaints are received, all work shall cease and approved mitigation measures shall be implemented immediately.

- During excavation, monitoring for organics as methane shall be conducted at the property line at a location downwind from the excavation site. If the monitoring results indicate that the ambient concentration reaches 150ppm, all excavation shall cease and the approved mitigation measures implemented.
- 10. During excavation, all dirt working areas, excavated material, and dirt roadways shall be watered until the surface is moist and then maintained in a moist condition to reduce dust.
- 11. Excavation shall not be conducted on days when the SCAQMD forecasts second or third stage episodes for the area where the excavation will occur.
- 12. Excavation shall not be conducted on days when the wind velocity is greater than 15 m.p.h. average or 25 m.p.h. gusts.
- 13. During loading and transport, no material shall extend above the sides or rear of the truck or trailer which will haul the excavated material.
- 14. The exterior of trucks hauling excavated material must be cleaned off prior to leaving the excavation site.
- 15. All excavated solid materials shall be transported in trucks which are covered with an impermeable cover, with such covers tied down.
- 16. The asphalt pad used to aerate the material excavated from areas B and C shall be completely cleaned free of all excavated material after aeration is complete to prevent fugitive dust emissions.
- 17. If hazardous material or organic liquids are encountered during the excavation in concentrations greater than those reported in the core samples, excavation must cease and the District notified. Additional mitigation measures as deemed necessary by the District must be implemented prior to resuming excavation.
- 18. All excavation material must be transported in such a manner as to prevent any emissions of hazardous materials.
- 19. All hazardous materials shall be transported in containers clearly marked as to the type(s) of material contained and what procedures should be followed in case of accidental spills.
- 20. During the transport of hazardous material(s), if a spill occurs, the immediate area may be evacuated and monitors set up downwind. The evacuated area shall then be extended to the point at which ambient levels are considered safe.
- 21. Mitigation measures, other than those indicated in these conditions, which are deemed appropriate by the Executive Officer as necessary to protect the confort, repose, health or safety of the public, shall be implemented upon request.

- 22. All materials that are listed as hazardous by a Federal or State agency shall be considered "hazardous materials" for the purpose of this permit.
- 23. Other governmental agencies may require approval before any excavation begins. It shall be the responsibility of the applicant to obtain that approval.

The South Coast Air Quality Management District shall not be responsible or liable for any losses because of measures required or taken pursuant to the requirements of this approved excavation management plan.

If you have any questions concerning this permit, please call Robert Pease at (818) 572-6174.

Very truly yours,

Sanford M. Weiss Director of Engineering

E Litter

Fred E. Lettice

Supervising Engineer

RP:tdb



1020 Seventh North Street, Liverpool, NY 13088 • (315) 457-6711

February 11, 1985

South Coast Air Quality
Management District
9150 Flair Drive
Elmonte, California 91731

Attn: Mr. Fred Lettice

Supervising Engineer

Re: Air Quality Permit

Trent Tube Plant Fullerton, California

CAD 008325110

File: 469.003

Gentlemen:

In accordance with your Letter Permit of February 5, 1985, please be advised that we intend to initiate excavation at the Trent Tube Plant site on Monday, February 11, 1985.

Should you have any questions regarding this matter, please contact Mr. Robert Phillips of Trent Tube, East Troy, Wisconsin.

Very truly yours,

CALOCERINOS & SPINA

RWK:mts

CC: Mr. R. Phillips

Richard W. Klippel, P.E. Industrial Waste Manager



1020 Seventh North Street, Liverpool, NY 19088 (315) 457-6711

February 20, 1985

South Coast Air Quality
Management District
9150 Flair Drive
Elmonte, California 91731

Attn: Mr. Fred Lettice

Supervising Engineer

Re: Air Quality Permit Trent Tube Plant Fullerton, California

CAD 008325110

File: 469.003

Gentlemen:

In accordance with your Letter Permit of February 5, 1985, please be advised that we initiated excavation at the Trent Tube Plant site on Monday, February 11, 1985.

Because formal agreement could not be reached with the California Department of Health Services regarding the Remedial Program, the Project was placed on "Hold" late in the morning of February 11, 1985. Once agreement has been made we plan to complete remediation and will notify you of our intended date of re-initiation.

This work may extend past March 1, 1985, thus requiring an extension of our Permit. Please let us know what we will need to provide you in order to obtain an extension.

Very truly yours,

CALOCERINOS & SPINA

AFD:mts

CC: Mr. R. Phillips

Andrew F. Diefendorf Applied Geoscience Manager



1020 Seventh North Street, Liverpool, NY 13088 • (315) 457-6711

February 27, 1985

South Coast Air Quality
Management District
9150 Flair Drive
Elmonte. California 91731

Attn: Mr. Fred Lettice Supervising Engineer

> Re: Air Quality Permit Trent Tube Plant Fullerton, California CAD 008325110

File: 469.003

Gentlemen:

In accordance with your Letter Permit of February 5, 1985, please be advised that we re-initiated excavation at the Trent Tube Plant site on Monday, February 25, 1985.

All soil excavation and replacement work is planned to be completed on Friday, March 1, 1985. We therefore do not anticipate a request for an SCAOMD Permit Extension.

At this time we would like to thank you and your staff for your courtesy and cooperation in assisting us to reach a timely conclusion to this Facility closure.

Very truly yours,

CALOCERINOS & SPINA

Andrew F. Diefendorf, CPG Manager, Applied Geoscience

AFD:mts

CC: Mr. R. Phillips



1020 Seventh North Street, Liverpool, NY 13058 • (315) 457-6711

March 4, 1985

Mr. Fred Lettice
Supervising Engineer
South Coast Air Quality
Management District
9150 Flair Drive
Elmonte, California 91731

Attn: Mr. R. Pease

Re: Site Remediation Plan

Trent Tube Plant

2100 East Orangethorpe Ave.

Fullerton, California

CAD 008325110

File: 469.003

Dear Mr. Lettice:

This letter is to notify you that all remedial excavation, aeration and soil replacement work was completed at the above-referenced Facility on Friday, March 1, 1985.

Our Supervising Geologist has informed us that weather conditions were ideal and that no fugitive dust conditions or air-quality monitoring problems arose.

Again, we wish to thank you for your timely cooperation in assisting us with this closure.

Very truly yours,

CALOCERINOS & SPINA

AFD:mts

Andrew F. Diefendorf, CPG Manager, Applied Geoscience

CC: Mr. R. Phillips

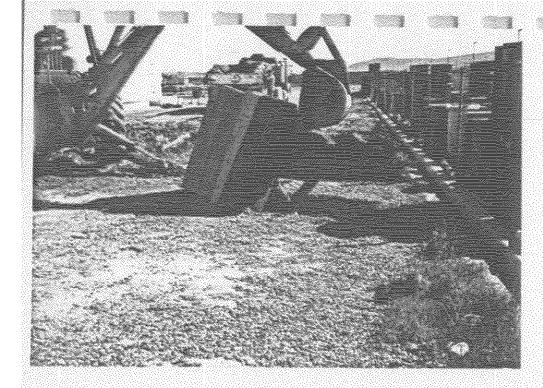
APPENDIX I

PHOTOS OF EXCAVATION AND

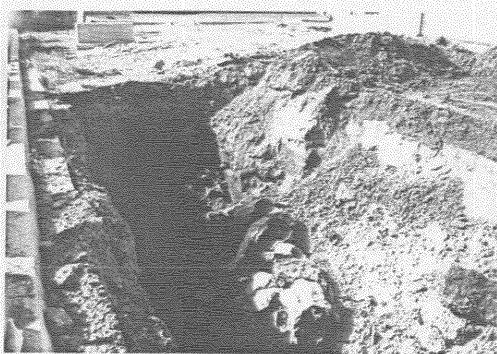
MANIFEST FORMS SHOWING DISPOSAL

OF EXCAVATED SOILS SHIPPED TO DISPOSAL

DURING REMEDIATION WORK - FEBRUARY 11, 1985









State of California Health and Welfare Agency

GENERATOR COPY

Department of Health Services Toxic Substances Control Division Sacramento, California

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APPENDIX J

DEPARTMENT OF HEALTH SERVICES COMMENT LETTER
ON REMEDIATION AND EXCAVATION PLAN

DEPARTMENT OF HEALTH SERVICES

- 107 SOUTH BROADWAY, ROOM 7128 LOS ANGELES, CA 90012 (213) 620-2380



February 20, 1985

Robert Phillips Trent Tube Division Colt Industries P. O. Box 88 Pitsburgh, PA 15230

EXCAVATION AND/OR CHARACTERIZATION OF CONTAMINATION OF CONTAMINATED SOILS AT TRENT TUBE FACILITY FULLERTON, CALIFORNIA CAD 008325110

Dear Mr. Phillips:

This to confirm the February 11, 1985 discussion between you and Roy Thielking of my staff concerning the February 1, 1985 excavation plan you submitted to this office as part of the Facility Closure Plan.

The volume of soil within a semicircle defined by boring locations D-1, C-3 and D-3 on Figure 8 of the plan and within five feet of the surface must either be excavated and removed as hazardous waste to a legal point of disposal or be further characterized to show that portions thereof are not contaminated with more than five parts per million of hazardous wastes.

Your proposal to excavate and aerate the outlying portions of Area B which were found to have less than five parts per million of contamination is acceptable.

You are directed to submit to this office by March 15, 1985, a written plan for characterization, and, if appropriate, excavation of contaminated soils south of boring D-2 and between the Trent Tube property line and the flood control channel.

Should you have any questions or wish to meet with my staff, please call Roy Thielking. $\dot{}$

Sincerely,

John A. Hinton, P.E., Manager Facility Permitting Unit

Toxic Substances Control Division

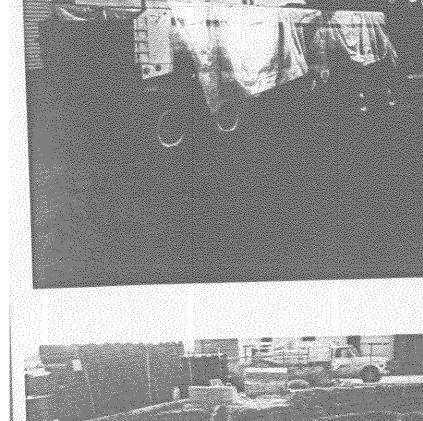
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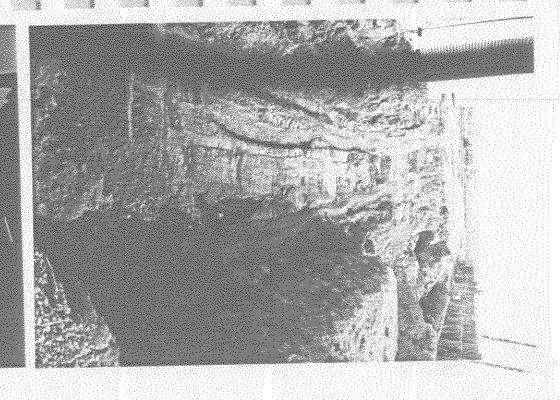
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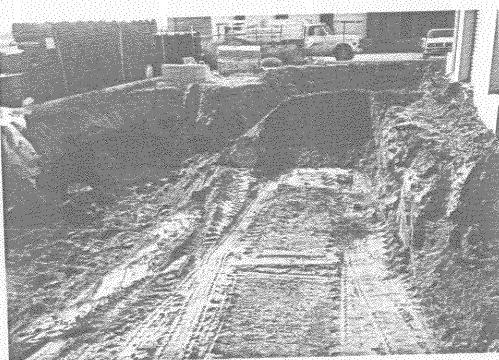
Attn: Wayne Smith

APPENDIX K

PHOTOGRAPHS SHOWING REMEDIATION, DRAWINGS OF
REVISED EXCAVATION LIMITS AND
MANIFESTS SHOWING PROPER DISPOSAL OF
CONTAMINATED SOIL SHIPPED TO DISPOSAL AT
CASMALIA RESOURCES - FEBRUARY 25-28, 1985



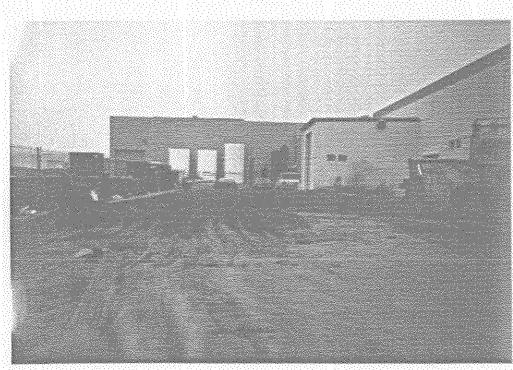






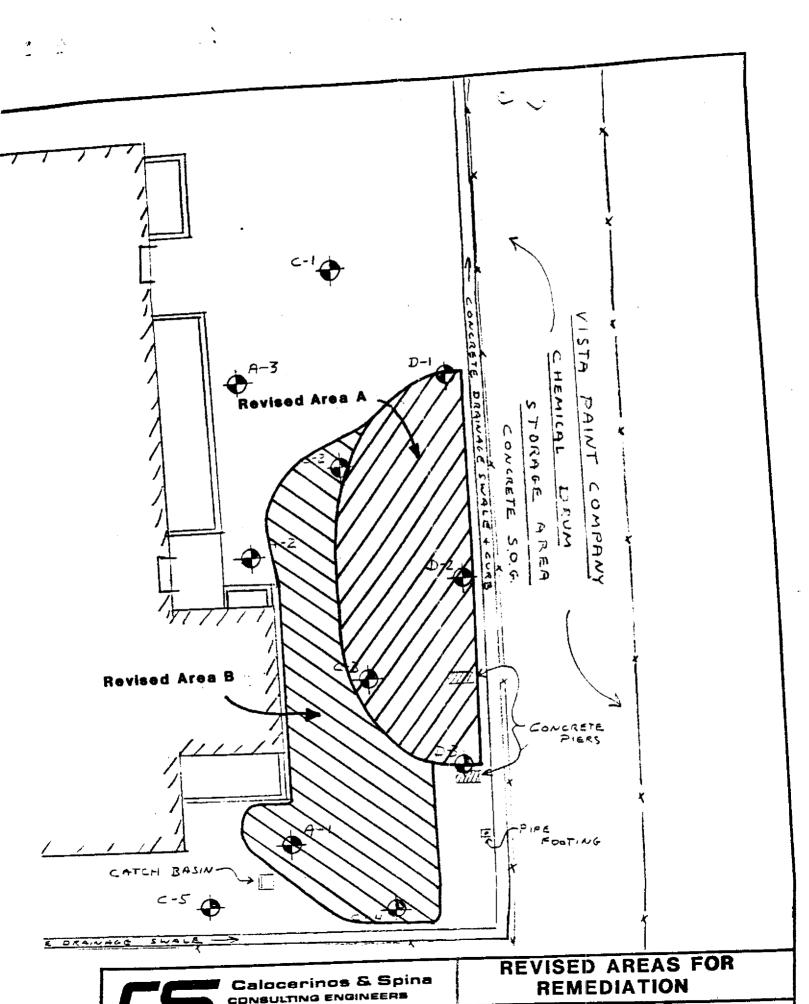








TRENT TUBE PLANT

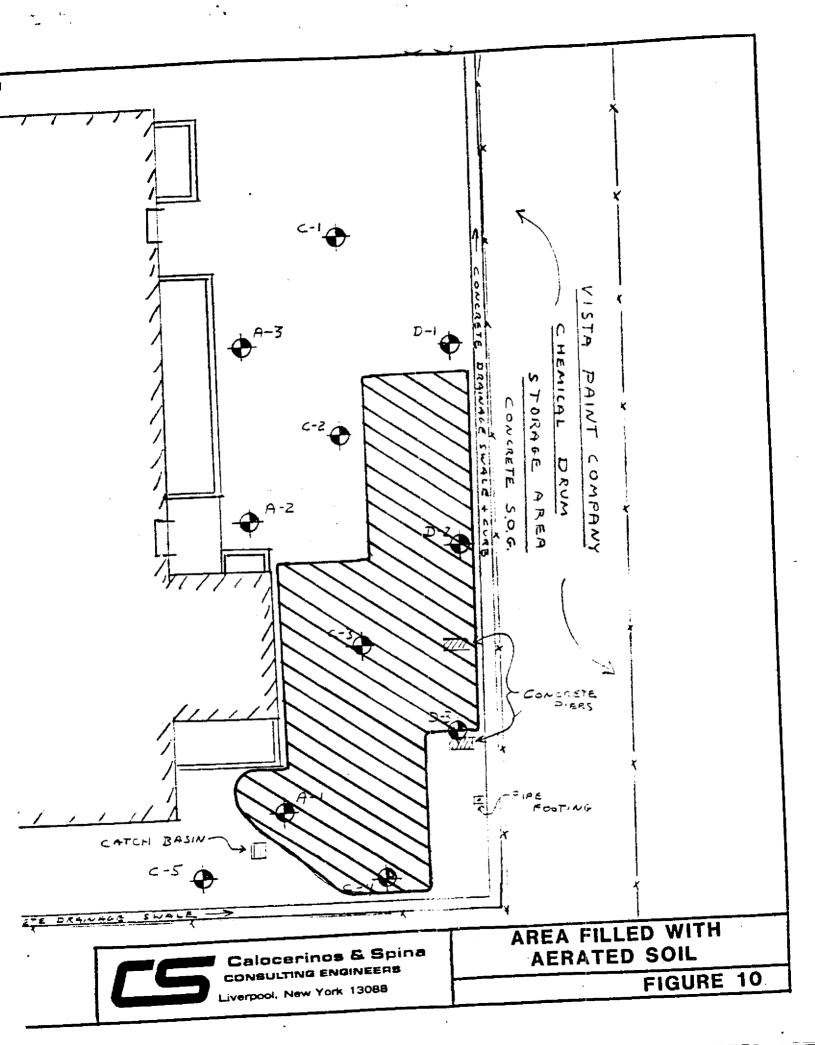


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4. Generator's Phone (92634) 714-632-0				5000 PER 1997	直接管	
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Department of Health Services Toxic Substances Control Division Sacramento, California

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	3. Generator's Name and Mailing Address	<u> </u>		ME	- ·	anifest D	cument	Number Number
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l	15 Special Handling Instructions and Additional	information -						
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State of California—Health and Welfare Agency

GENERATOR COPY

Department of Health Services Toxic Substances Control Division Sacramento, California

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19. Discrepancy Indication Space							
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nem 19. # 4/330 -3	7 38016	>				ſ	Date
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State of California—Health and Welfare Agency

GENERATOR COPY

Department of Health Services
Toxic Substances Control Division
Sacramento, California

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	3. Generator's Name and Mailing Address Trent. Tube 2100 E. Grangethorpe 4. Falleringspines (9263) 714-632-01		0 0 0	84 B.Sta	Manufest 58204 • Generator's	0 25	umber	
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T E R							<u> </u>	
F A C	9. Discrepancy Indication Space D. Facility Owner or Operator: Certification of receipt of hazard	dous materials covered h	v this may	nifest e	cent as noted	in		
-	# 4134X 21830 he		, come (11 0 1				Date	
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	Trant Tube 2100 E. Grangethorpe				B.State G		TD .	
	4. Generators Phone: Ca 92634	714-632-0181	L					
	5. Transporter 1 Company Name	6.	US EPA ID Numb		C.State Ti			2587
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Ť	17. Transporter 1 Acknowledgement of Rec	eipt of Materials	77					Date
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	18. Transporter 2 Acknowledgement or Rec	ceipt of Materials	/ -<	100	111			Date
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4117	20. Facility Owner or Operator: Certification Item 19.	of receipt of hazardo		by this m	anifest exc	pt as note		Date
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